TSD File Inventory Index

Date: November 6, 2001

Initial: C Mhuwo

Facility Name:	National Castings Incorporated (Melrose Park - One Fields Site)
Facility Identification Number:	ILD 072 317 761

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	√	.1 Correspondence	
.1 Correspondence	√	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	√	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments	√	**C.2 Compliance/Enforcement**	√
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	√
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	√	.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc	√	**D. 2 Corrective Action/Facility Investigation**	√
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: Documents do not justify individual folder per schedule

2 Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

APR 12 1982

Mr. James Pryor
Project Engineer
Midland - Ross Corporation
National Castings Division
110 North 25th Avenue
Melrose Park, Illinois 60160

RE: Interim Status Acknowledgement USEPA ID No. ILD072317761
FACILITY NAME: Midland - Ross Corporation National Castings Div.

Dear Mr. Pryor:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

GRH 4/12/82

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: G. L. Winger, Froup Vice President

FACILITY NAME

MIDLAND-ROSS CORP NATIONAL CASTINGS DIV

EPA ID NUMBER

ILD072317761

FACILITY OPERATOR

MIDLAND-ROSS CORP

FACILITY OWNER

MIDLAND ROSS CORP

FACILITY LOCATION

110 N 25TH AVE
MELROSE PARK IL 60160

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
T04	250	N
S03	250000	Y

---------- KEY ----------

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G or L
TANK	S02	G or L
WASTE PILE	S03	Y or C
SURFACE IMPOUNDMENT	S04	G or L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, or V
LANDFILL	D80	A or F
LAND APPLICATION	D81	B or Q
OCEAN DISPOSAL	D82	U or V
SURFACE IMPOUNDMENT	D83	G or L
TREATMENT:		
TANK	T01	U or V
SURFACE IMPOUNDMENT	T02	U or V
INCINERATOR	T03	D,W,E, or H
OTHER	T04	U,V,J,R,N, or S

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS/HOUR	W
GALLONS/HOUR	E
LITERS/HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS/HOUR	J
KILOGRAMS/HOUR	R
TONS PER DAY	N
METRIC TONS/DAY	S

5AHWM

DEC 30 1981

Mr. Michael R. Babbitt
Corporate Attorney
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

Re: Midland-Ross Corporation, National Casting Division
Melrose Park Works - ILD072317761
Cicero Works - ILD049015134

Dear Mr. Babbitt:

This will acknowledge that the U.S. Environmental Protection Agency (USEPA), Region V has received (1) notification pursuant to Section 3010 of the Resource Conservation and Recovery Act (RCRA) for each of the two facilities referenced above, (2) Part A permit applications for each of these facilities, and (3) signed affidavits that the hazardous waste management activities at these facilities began prior to November 19, 1980.

This information has been reviewed and these two facilities appear to qualify for interim status under Section 3005(e) of RCRA, and in accordance with USEPA policy published on November 19, 1980, at Federal Register 45:76618-636, a copy of which is enclosed.

Your letter dated September 28, 1981, and the affidavits pertaining to the operation of these facilities have been incorporated into your Part A applications.

These facilities will be treated as having had interim status from July 15, 1981. Facility owners and operators must comply with the standards set forth at 40 CFR 265 until a permit is issued. Interim status under RCRA does not relieve the owner or operator of a facility from the requirements of State or local agencies.

Sincerely,

Basil G. Constantelos
Acting Director
Waste Management Division

cc: Illinois EPA - Permits
Illinois EPA - Field Offices

bcc: Karl J. Klepitsch, Jr.
RAIS
ORC
OGC

BOB STONE:A.SUTTON:5AHWM:6-7482:12/14/81

12-14-8 for Erm 12/28/81 D. Banaszak Acting Br. Ch. 12/28/81

5AHWM

Mr. Michael R. Babbitt
Corporate Attorney
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

Re: Midland-Ross Corporation, National Casting Division
Melrose Park Works - ILD072317761
Cicero Works - ILD049015134

Dear Mr. Babbitt:

This will acknowledge that the U.S. Environmental Protection Agency (USEPA), Region V has received (1) notification pursuant to Section 3010 of the Resource Conservation and Recovery Act (RCRA) for each of the two facilities referenced above, (2) Part A applications for each of these facilities, and (3) a signed affidavit that the hazardous waste management activities at these facilities began prior to November 19, 1980.

deleted

This information has been reviewed and these two facilities appear to qualify these two facilities for interim status under Section 3005(e) of RCRA, and in accordance with USEPA policy published on November 19, 1980, at Federal Register 45:76618-636, a copy of which is enclosed.

Your letter dated September 28, 1981, and the affidavits pertaining to the operation of these facilities have been incorporated into your Part A applications.

These facilities will be treated as having had interim status from July 15, 1981. Facility owners and operators must comply with the standards set forth at 40 CFR 265 until a permit is issued. Interim status under RCRA does not relieve the owner or operator of a facility from the requirements of State or local agencies.

Sincerely,

Basil G. Constantelos
Acting Director
Waste Management Division

cc: Illinois EPA - Permits
Illinois EPA - Field Offices

bcc: Karl J. Klepitsch, Jr.
RAIS
ORC
OGC

	TYPIST	AUTHOR	PSU CHIEF	STU #1 CHIEF	PTU #2 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
BOB STONE	A.SUTTON:5AHWM:6-7482:12/11/81							
INITIALS	AS					Em	KK	DS for BGC
DATE	12/11/81					12/7/81	12/14/81	12/29/81

5AHWM

Mr. Michael R. Babbitt
Corporate Attorney
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

Re: Midland-Ross Corporation, National Casting Division
Melrose Park Works - ILD072317761
Cicero Works - ILD049015134

Dear Mr. Babbitt:

This will acknowledge that the U.S. Environmental Protection Agency (USEPA), Region V has received (1) notification pursuant to Section 3010 of the Resource Conservation and Recovery Act (RCRA) for each of the two facilities referenced above, (2) Part A applications for each of these facilities, and (3) a signed affidavit that the hazardous waste management activities at these facilities began prior to November 19, 1980.

Revised

This information has been reviewed and found to be sufficient to qualify these two facilities for interim status under Section 3005(e) of RCRA, and in accordance with USEPA policy published on November 19, 1980, at Federal Register 45:76618-636, a copy of which is enclosed.

Your letter dated September 28, 1981, and the affidavits pertaining to the operation of these facilities have been incorporated into your Part A applications.

These facilities will be treated as having had interim status from July 15, 1981. Facility owners and operators must comply with the standards set forth at 40 CFR 265 until a permit is issued. Interim status under RCRA does not relieve the owner or operator of a facility from the requirements of State or local agencies.

Sincerely,

Basil G. Constantelos, Acting Director
Waste Management Division

cc: Illinois EPA - Permits
Illinois EPA - Field Offices

bcc: Karl J. Klepitsch, Jr.
RAIS
ORC
OGC

BOB STONE:A.SUTTON:5AHWM:6-7482:12/7/81

INITIALS	ABS	RBS	X	ORC. HC	EM	AHMD DIRECTOR
DATE	12/7/81	12/7/81		12/28/81	12/7/81	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: NOV 30 1981

SUBJECT: Record of Phone Conversations

RE: Part A Applications Submitted by Midland-Ross Corporation, National Casting Div. for Melrose Park Works - ILD072317761 and Cicero Works - ILD049015134.

FROM: Robert L. Stone
State Technical Unit #1

TO: RAIS for Part A Files

During the week of November 16, 1981, I had conversations with Michael Babbit, Corporate Attorney for Midland-Ross pertaining to the Part A applications referenced above. I told Mr. Babbit that the activities described in the documents he had submitted included storage, although he had not included storage on the applications. Apparently at the time the forms were submitted, the company presumed they would receive USEPA approval for the described treatment process and storage would not be necessary.

I told Mr. Babbit that it is standard procedure for USEPA employees to make entries on Part A applications on the basis of phone conversations with the applicant, and that I would enter the codes for storage on the above Part A applications on the basis of phone conversations with the applicant, and that I would enter the codes for storage on the above Part A applications. He agreed that the applications should indicate storage. I made the entries on a copy, as is the current procedure, and had these corrected copies placed into the official Part A folders.

BOB STONE:A.SUTTON:5AHWM:6-7482:11/30/81

	TYPIST	AUTHOR	PSU CHIEF	OTU #1 CHIEF	STU #2 CHIEF	TAS CHIEF	STS CHIEF	AHMD DIRECTOR
INITIALS								
DATE	175 11/30/81	11-30-81						

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD072317761 REACKNOWLEDGEMENT

NATIONAL CASTING DIVISION
110 N 25TH AVE
MELROSE PARK IL 60160

INSTALLATION ADDRESS ➤

110 N 25TH AVE
MELROSE PARK IL 60160

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type (12 characters) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO.: Add TSD 10/20/81 85

I. NAME OF INSTALLATION:
NATIONAL CASTINGS DIV.
MIDLAND-ROSS CORP.

II. INSTALLATION MAILING ADDRESS:
PLEASE PLACE LABEL IN THIS SPACE
110 N. 25TH AVE.
MELROSE PARK, IL 60160

III. LOCATION OF INSTALLATION

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
S F ILD072317761 T/A C 1		8/07/10

I. NAME OF INSTALLATION
NATIONAL CASTINGS DIVISION

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX: 110 N 25TH AVENUE

CITY OR TOWN: MELROSE PARK — ST.: IL — ZIP CODE: 60160

III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER: 110 N 25TH AVENUE

CITY OR TOWN: MELROSE PARK — ST.: IL — ZIP CODE: 60160

IV. INSTALLATION CONTACT
NAME AND TITLE *(last, first, & job title)*: PRYOR JAMES PROJECT ENGINEER

PHONE NO. *(area code & no.)*: 312-344-0675

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER: MIDLAND ROSS CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD072317761

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W														1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

DETACH

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☒ 4. TOXIC (D000)

X. CERTIFICATION

DETACH

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
L. J. Sieja By Michael Babcock	L. J. Sieja Plant General Superintendent	July 7, 1981

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.: Correct Name 10/20/81 ab
Add TSD

I. NAME OF INSTALLATION: NATIONAL CASTINGS DIV.
MIDLAND-ROSS CORP.

II. INSTALLATION MAILING ADDRESS: PLEASE PLACE LABEL IN THIS SPACE
110 N. 25TH AVE
MELROSE PARK, IL. 60160

III. LOCATION OF INSTALLATION

000893 DEC 1980

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH A

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD072317761 T/A 2 C 1	A	801117

I. NAME OF INSTALLATION
NATIONAL CASTINGS DIVISION IGS DIV.

II. INSTALLATION MAILING ADDRESS
STREET OR P.O. BOX: 110 N 25TH AVENUE

CITY OR TOWN: MELROSE PARK — ST.: IL — ZIP CODE: 60160

III. LOCATION OF INSTALLATION
STREET OR ROUTE NUMBER: 110 N 25TH AVENUE

CITY OR TOWN: MELROSE PARK — ST.: IL — ZIP CODE: 60160

IV. INSTALLATION CONTACT
NAME AND TITLE *(last, first, & job title)*: PRYOR JAMES PROJECT ENGINEER
PHONE NO. *(area code & no.)*: 312-344-0675

V. OWNERSHIP
A. NAME OF INSTALLATION'S LEGAL OWNER: MIDLAND-ROSS CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M
F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*
- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*
- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD072317761

IX. DESCRIPTION OF HAZARDOUS WASTES
Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

NOV 17 1980

CONTINUE ON REVERSE

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

I. INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

NATIONAL CASTINGS DIV.
MIDLAND-ROSS CORP.
110 N. 25TH AVE
MELROSE PARK, IL. 60160

000893 DEC 19 80

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD072317761 T/A 2 C 1	A	80 11 17

I. NAME OF INSTALLATION

NATIONAL CASTINGS DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 110 N 25TH AVENUE

CITY OR TOWN: MELROSE PARK | ST.: IL | ZIP CODE: 60160

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 110 N 25TH AVENUE

CITY OR TOWN: MELROSE PARK | ST.: IL | ZIP CODE: 60160

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: PRYOR JAMES PROJECT ENGINEER

PHONE NO. *(area code & no.)*: 312-344-0675

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: MIDLAND-ROSS CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD072317761

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

NOV 17 1980

CONTINUE ON REVERSE

I.D. -- FOR OFFICIAL USE ONLY

S												T/A	C
W	I	L	D	0	7	2	3	7	7	6	1	2	1
1	2										13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- ☐ 1. IGNITABLE (D001)
- ☐ 2. CORROSIVE (D002)
- ☐ 3. REACTIVE (D003)
- ☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
John A. Doyle	WORKS MANAGER	11/17/80

DETACH

DETACH

MIDLAND ROSS

Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122
(216) 491-8400

October 4, 19894

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Attention: 5HW-13

Re: Request for Information
Storage & Waste Piles
Facility Names:
Midland-Ross Corporation
National Castings Division
Melrose Parks Works - EPA ID No. ILD072317761 G, TSD, PA
Cicero Works - EPA ID No. ILD049015134 G, TSD, PA

Gentlemen:

Enclosed are amended Part A Applications for the captioned facilities. They are being submitted at the suggestion of Lisa Pierard of your Agency. They reflect the fact that neither facility stores hazardous waste in waste piles. This letter will further confirm that neither facility has ever stored hazardous waste in waste piles.

Thank you for your guidance and assistance in this matter.

Very truly yours,

Michael R. Babbitt

Michael R. Babbitt
Senior Corporate Attorney

MRB/mlb
Enclosures

cc: Cicero Works
Melrose Park Works

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F IL D 0 7 2 3 1 7 7 6 1

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

RECEIVED
OCT 12 1984
WMD-RAIU
EPA, REGION V

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced** terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: NATIONAL CASTINGS DIVISION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
2 McKEE CARL PLANT ENGINEER	312	344	0675

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 110 NORTH 25TH AVENUE			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 MELROSE PARK	IL	60160	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 110 NORTH 25TH AVENUE			
B. COUNTY NAME			
COOK			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE** *(if known)*
6 MELROSE PARK	IL	60160	

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST: 3325 (specify) STEEL FOUNDRY

B. SECOND: (specify)

C. THIRD: (specify)

D. FOURTH: (specify)

VIII. OPERATOR INFORMATION

A. NAME: MIDLAND-ROSS CORPORATION

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)

D. PHONE (area code & no.): A 216 491 8400

E. STREET OR P.O. BOX: 20600 CHAGRIN BOULEVARD

F. CITY OR TOWN: B CLEVELAND

G. STATE: OH

H. ZIP CODE: 44122

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☐ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N

D. PSD (Air Emissions from Proposed Sources): 9 P

B. UIC (Underground Injection of Fluids): 9 U

E. OTHER (specify): 9 03118ABF (specify) ILLINOIS EPA OPERATING PERMIT

C. RCRA (Hazardous Wastes): 9 R

E. OTHER (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

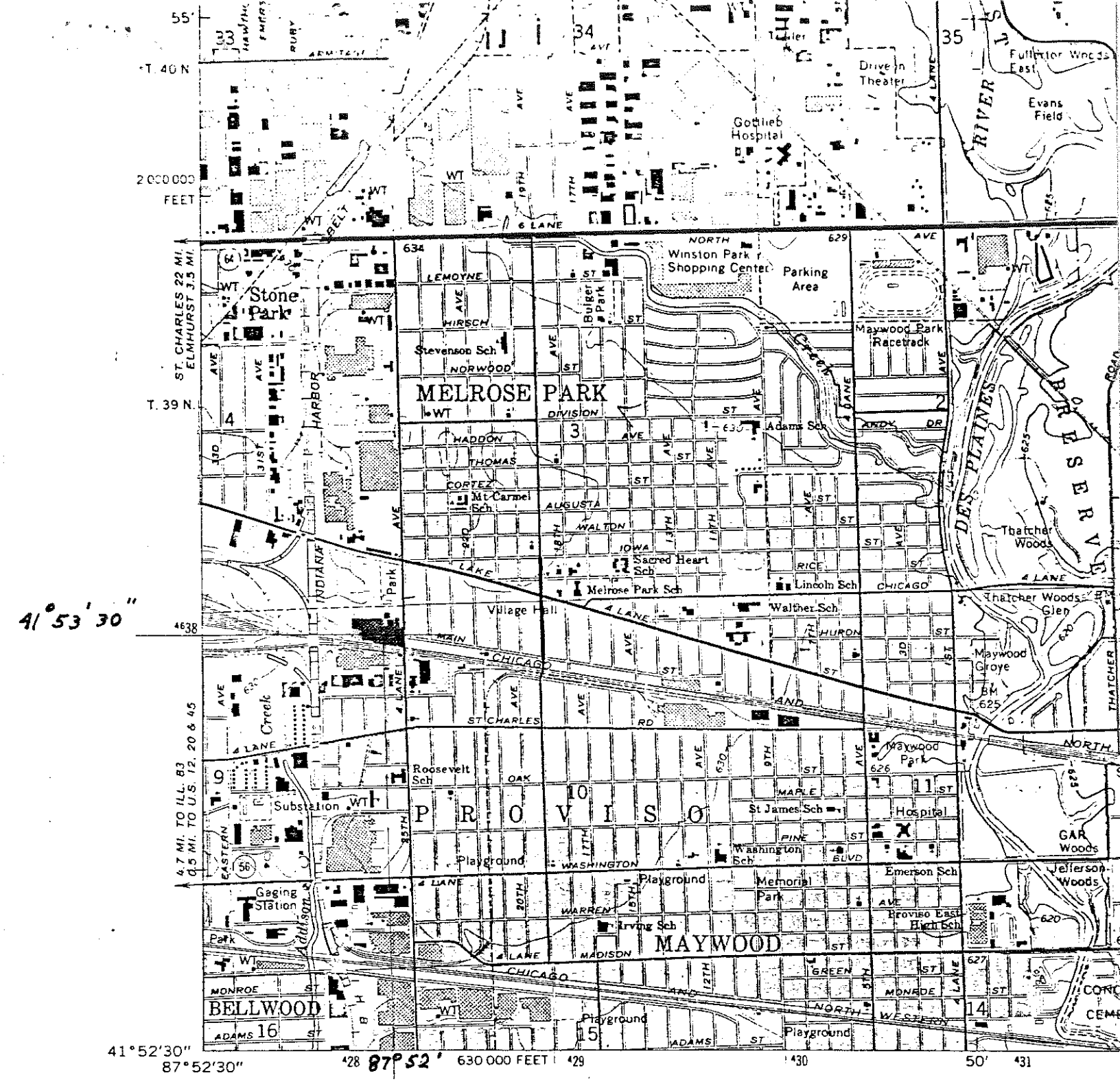
THIS FACILITY IS A STEEL FOUNDRY ENGAGED IN THE PRODUCTION OF CASTINGS PRIMARILY FOR THE RAIL CAR BUILDING INDUSTRY. STEEL SCRAP IS MELTED AND REFINED IN AN ELECTRIC ARC FURNACE AND THE MOLTEN METAL POURED INTO SAND MOLDS.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
John J. Fennessey Executive Vice President	X	October 8, 1984

COMMENTS FOR OFFICIAL USE ONLY



Mapped, edited, and published by the Geological Survey
in cooperation with State of Illinois Geological Survey

Control by USGS, USC&GS, City of Chicago, and
Cook County Highway Department

Planimetry by photogrammetric methods from aerial photographs
taken 1962–63. Topography by planetable surveys 1924–25
Revised 1963

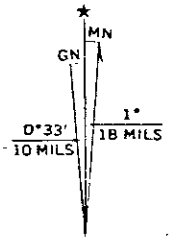
Polyconic projection. 1927 North American datum
10,000-foot grid based on Illinois coordinate system, east zone
1000-meter Universal Transverse Mercator grid ticks,
zone 16, shown in blue

Red tint indicates areas in which only landmark buildings are shown

Revisions shown in purple compiled from aerial photographs
taken 1972. This information not field checked

Purple tint indicates extension of urban areas

(HINSDALE)
3467 IV SW



UTM GRID AND 1972 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET

1
1000

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S												T/A	C
F	I	L	D	0	7	2	3	1	7	7	6	1	

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[ ] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	68	7	10

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[X] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S												T/A	C
C	D	U	P										1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	55	G		7				
2	T04	Limited only by the availability of waste containers	U		8		~~Limited only by the availability of waste containers~~		
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Electric Furnace dust is intermixed with non-hazardous wastes when loading into containers.

The resulting composite is non-hazardous.

The average container is 20 Cubic Yards.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)														FOR OFFICIAL USE ONLY												
S												T/A	C	S											T/A	C
W	I	L	D	0	7	2	3	1	7	7	6	1	1	W	D	U	P								2	D U P
1	2											13	14 15	1	2									13	14	15 23 - 26

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code) 23 - 26	B. ESTIMATED ANNUAL QUANTITY OF WASTE 27 - 35	C. UNIT OF MEASURE (enter code) 36	D. PROCESSES 1. PROCESS CODES (enter) 27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D 0 0 6	260	T	S 0 1 T 0 4	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
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14					
15					
16					
17					
18					
19					
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21					
22					
23					
24					
25					
26					

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F	I	L	D	0	7	2	3	1	7	7	6	1		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
41 53 03 0	087 52 00 0

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John J. Fennessey	X	October 8, 1984

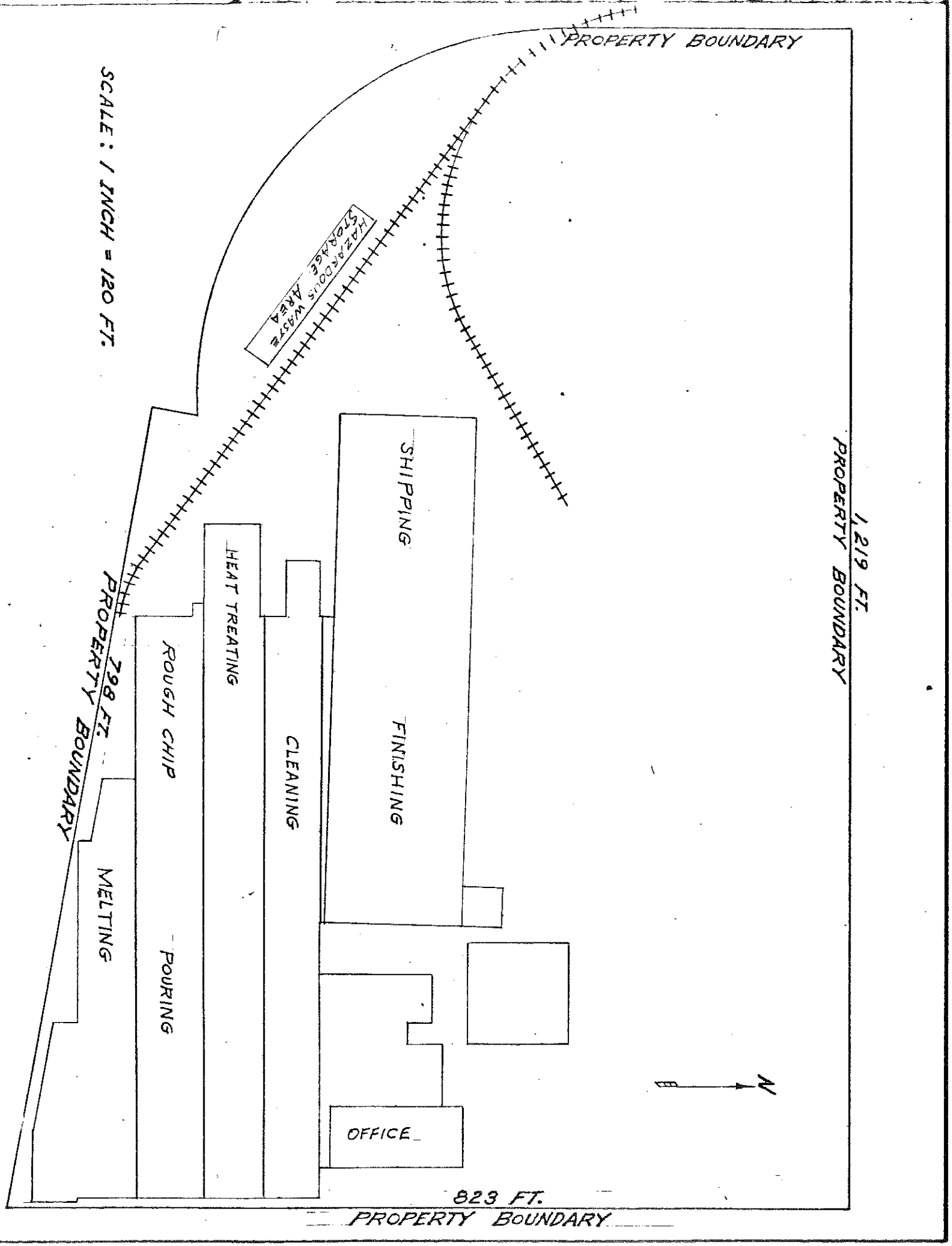
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John J. Fennessey	X	October 8, 1984

Form Approved OMB No. 155 S80004

V. FACILITY DRAWING *(see page 4)*



MIDLAND ROSS

Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122
(216) 491-8400

July 12, 1985

Mr. Jim Moore
Solid Waste Section
Illinois EPA
2200 Churchill Road
Springfield, Illinois 62706

Re: Notification of Transfer of Ownership
0310000000 - Cook County
Cicero/Midland-Ross Corporation
ID# ILD 049015134 C, PA, 8

and

0311860012 - Cook County
Melrose Park/Midland-Ross Corporation
ID# ILD 072317761 C, PA, 8

Dear Mr. Moore:

As per our conversation on July 11, 1985, this letter will serve as notification of transfer of ownership of the abovementioned facilities. On July 1, 1985, Midland-Ross Corporation, 20600 Chagrin Boulevard, Cleveland, Ohio 44122, sold the abovementioned facilities to National Castings, Inc., 1 Oakbrook Terrace, Suite 316, Oakbrook Terrace, Illinois 60181.

As I mentioned on April 30, 1985, Midland-Ross filed final closure plans for the Part A storage facility permits for both facilities and at the same time requested withdrawal of the Part A applications for treatment facility permits with respect to both facilities.

Please make the necessary adjustments (if any are required) regarding transfer of ownership for all Illinois solid waste treatment, storage and generator permits.

Very truly yours,

David J Greenham

David J. Greenham
Legal Assistant

DJG/mlb

cc: M. R. Babbitt
J. Giba
Diane Spencer, US EPA

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

G. L. Winger, Group Vice President
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

RE: Request for Information--Part A Hazardous Waste Permit Application Review (Storage in Waste Piles)
FACILITY NAME: Midland-Ross Corp., National Castings Div-Melrose Park
U.S. EPA ID NO.: ILD072317761

Dear Mr. Winger:

This letter serves to inform you that the United States Environmental Protection Agency has completed a review of your Part A Hazardous Waste Permit Application. Our review indicates your facility may be required to comply with the Waste Pile regulations under §3005 of the Resource Conservation and Recovery Act, as amended; however, further clarification is needed.

Based on the information submitted, your facility appears to store hazardous waste in a waste pile. If it does, you must comply with the Waste Pile requirements as defined in 40 CFR Part 265 Subpart L (enclosed). If you determine that your facility does not store hazardous waste in a waste pile, please submit a revised Part A and a detailed explanation of all changes made to the Regional office, indicating your present methods of hazardous waste treatment, storage, or disposal. Unless we receive a reply within 15 days, we will assume that your facility stores hazardous waste in a waste pile, and is subject to all permitting requirements.

Please be advised that if at any time since November 19, 1980, your operation included the storage of hazardous waste in a waste pile subject to 40 CFR Part 265, a closure plan must be filed with the Regional office. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Request for Information--Storage in Waste Piles," in all correspondence on this matter.

Sincerely yours,

for

Elmore Christenson, Chief
State Programs and Information Section

Enclosures

cc: James Pryor, Project Engineer

G.L. Winger, Group Vice President
Midland - Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio
44122

5HW-13

RE: Request for Information--Part A Hazardous Waste Permit Application Review (Storage in Waste Piles) ✓

FACILITY NAME: Midland - Ross Corp, National Castings Div. - Melrose Park
U.S. EPA ID NO.: ILD 072 317 761

Dear Mr. Winger,

This letter serves to inform you that the United States Environmental Protection Agency has completed a review of your Part A Hazardous Waste Permit Application. Our review indicates your facility may be required to comply with the Waste Pile regulations under §3005 of the Resource Conservation and Recovery Act, as amended; however, further clarification is needed.

Based on the information submitted, your facility appears to store hazardous waste in a waste pile. If it does, you must comply with the Waste Pile requirements as defined in 40 CFR Part 265 Subpart L (enclosed). If you determine that your facility does not store hazardous waste in a waste pile, please submit a revised Part A and a detailed explanation of all changes made to the Regional office, indicating your present methods of hazardous waste treatment, storage, or disposal. Unless we receive a reply within 15 days, we will assume that your facility stores hazardous waste in a waste pile, and is subject to all permitting requirements.

Please be advised that if at any time since November 19, 1980, your operation included the storage of hazardous waste in a waste pile subject to 40 CFR Part 265, a closure plan must be filed with the Regional office. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

Please contact the Regulatory Analysis and Information Unit at (312) 886-6148 for assistance, if you have any questions. Please refer to "Request for Information--Storage in Waste Piles," in all correspondence on this matter.

Sincerely yours,

Elmore Christenson, Chief
State Programs and Information Section

Enclosures

cc James Pryor, Project Engineer
Midland - Ross Corporation
110 North 25th Avenue
Melrose Park, Illinois 60160

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: NOV 30 1981

SUBJECT: Record of Phone Conversations

RE: Part A Applications Submitted by Midland-Ross Corporation, National Casting Div. for Melrose Park Works - ILD072317761 and Cicero Works - ILD049015134.

FROM: Robert L. Stone
State Technical Unit #1

TO: RAIS for Part A Files

During the week of November 16, 1981, I had conversations with Michael Babbit, Corporate Attorney for Midland-Ross pertaining to the Part A applications referenced above. I told Mr. Babbit that the activities described in the documents he had submitted included storage, although he had not included storage on the applications. Apparently at the time the forms were submitted, the company presumed they would receive USEPA approval for the described treatment process and storage would not be necessary.

I told Mr. Babbit that it is standard procedure for USEPA employees to make entries on Part A applications on the basis of phone conversations with the applicant, and that I would enter the codes for storage on the above Part A applications on the basis of phone conversations with the applicant~~, and that I would enter the codes for storage on the above Part A applications.~~ He agreed that the applications should indicate storage. I made the entries on a copy, as is the current procedure, and had these corrected copies placed into the official Part A folders.

MIDLANDROSS

September 29, 1981

CERTIFIED - RRR (BY MESSENGER)

Mr. Robert Stone
State Implementation Officer
United States EPA, Region V
111 West Jackson, 16th Floor
Chicago, Illinois 60604

Re: Midland-Ross Corporation, National Castings Division
Melrose Park Works - EPA No. ILD 072317761
Cicero Works - EPA No. ILD 049015134

Dear Mr. Stone:

On or about July 14, 1981, the two captioned facilities filed Part A Applications to obtain the EPA's authorization to proceed with the mixing of certain waste generated on the premises in order to render those wastes non-hazardous, as defined by applicable US EPA Regulations. Through a misunderstanding, Subparagraph A of Section II of Application No. 3 of the Part A Application was completed showing each of the facilities to be a "new facility" scheduled to "begin" operation on July 10, 1981. In fact, and as demonstrated by the enclosed affidavits, each of these facilities was in existence prior to November 19, 1980. Accordingly, all notations in Subparagraph A.2. thereof should be deleted and Subparagraph A.1. should show that each facility was an "existing facility". The Cicero facility has been intermixing and co-disposing since late 1966 and Melrose Park has done so since early 1969 (we are not sure of the exact date).

Enclosed are the following additional documents which are being submitted for each of the facilities:

1. My affidavits stating that as of November 19, the "treatment" of the waste was terminated on my advice because it was our understanding of applicable Regulations that mixing the wastes would result only in the production of additional hazardous waste.

MIDLANDROSS

2. The affidavits of John Waite, Works Manager for both facilities stating that prior to November 19, 1980, each facility regularly intermixed the wastes which are the subject of the Part A Application.

3. A copy of certified laboratory analyses of the material resulting from intermixing the "hazardous" and non-hazardous wastes at each facility, as described in the Part A Application.

The additional material is being submitted to demonstrate the Company's good faith in its filing activity with the EPA, as well as the non-hazardous nature of the end product of the intermixing process which is described in the Application.

We respectfully request prompt action by the EPA on this matter and hope to receive an "Interim Status Compliance Letter" or its equivalent in the very near future.

Please let me know if I can be of further assistance to you.

Very truly yours,

Michael R. Babbitt
Corporate Attorney

MRB/lsj
Encs.

AFFIDAVIT

COUNTY OF COOK)
) SS
STATE OF ILLINOIS)

I, Michael R. Babbitt, after being first duly sworn do hereby depose and say as follows:

1. I am now, and at all times relevant hereto have been, a Corporate Attorney employed by Midland-Ross Corporation.

2. Since May, 1980, I have been primarily responsible for monitoring EPA Regulations and rendering advice to Midland-Ross facilities regarding the Resource Conservation and Recovery Act of 1976.

3. As of November 19, 1980, it was my understanding of applicable EPA Regulations that adding non-hazardous waste to so-called "hazardous" waste, whether not that hazardous waste was a "listed" waste, resulted in the generation of additional "hazardous" waste, even if the mixing resulted in the production of a "non-hazardous" waste. My understanding at that time was confirmed in conversations I had with State of Illinois and State of Pennsylvania environmental regulatory officials in the enforcement of their respective state programs.

4. Based upon my understanding of the Regulations, I advised the Melrose Park Facility to discontinue the intermixing of its waste and to begin to segregate the so-called "hazardous" portions of its waste effective November 19, 1980. The Melrose Park Works did so.

Further Affiant sayeth naught.

Michael R. Babbitt

MICHAEL R. BABBITT

Sworn to and subscribed in my presence this 29th day of September 1981.

Steven A. Tarr

NOTARY PUBLIC

AFFIDAVIT

COUNTY OF COOK)
) SS
STATE OF ILLINOIS)

I, John W. Waite, after being first duly sworn do hereby depose and say as follows:

1. I am the Works Manager of the Melrose Park Works of the National Castings Division of Midland-Ross Corporation, and am knowledgeable about and generally advised of the production activities thereof.

2. Prior to November 19, 1980, since early 1969, the Melrose Park Works had co-disposed of furnace pollution control dust with other dusts by intermixing the dusts in railroad cars and/or trucks of varying types.

3. Prior to November 19, 1980 the Melrose Park Works was advised by Michael R. Babbitt, Corporate Attorney, to stop intermixing and co-disposing of the waste. Since that date the Melrose Park Works has not intermixed or co-disposed of the aforesaid waste.

Further Affiant sayeth naught.

JOHN W. WAITE

Sworn to and subscribed in my presence this 29th day of September, 1980.

NOTARY PUBLIC

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

1	2	3	4	5	6	7	8	9	10	11	12	13	F/A	C
F	I	L	D	0	7	2	3	1	7	7	6	1		D

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

III. FACILITY MAILING ADDRESS

IV. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: NATIONAL CASTINGS DIVISION

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 PRYOR, JAMES, PROJECT ENGINEER	312 344 0675

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 110 N. 25TH AVENUE

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 MELROSE PARK	IL	60160

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 110 N. 25TH AVENUE

B. COUNTY NAME

COOK

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 MELROSE PARK	IL	60160	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3325 STEEL FOUNDRY	

C. THIRD	D. FOURTH

VIII. OPERATOR INFORMATION

A. NAME: MIDLAND-ROSS CORPORATION

B. Is the name listed in Item VIII-A also the owner? ☒ YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)
P

D. PHONE (area code & no.): 216 491 8400

E. STREET OR P.O. BOX: 20600 CHAGRIN BOULEVARD

F. CITY OR TOWN: CLEVELAND

G. STATE: OH

H. ZIP CODE: 44122

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N	9 P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U	9 03118 6 ABF (specify) ILLINOIS EPA OPERATING PERMIT

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

WE OPERATE A STEEL CASTING FOUNDRY PRIMARILY FOR THE PRODUCTION OF STEEL CASTINGS FOR THE RAILROAD INDUSTRY. (KNUCKLES, YOKES, DRAWBARS)
SCRAP IS MELTED AND REFINED IN AN ELECTRIC ARC FURNACE AND POURED INTO SAND MOLDS

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
G. L. Winger, Group Vice President - Foundries	G L Winger	7/10/81

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

													T/A	C
S														
F	I	L	D	0	7	2	3	1	7	7	6	1		1
1	2											13	14	15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* — 71

☒ 2. NEW FACILITY *(Complete item below.)* — 71

C	YR.	MO.	DAY
8			
15	73 74	75 76	77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
81	07	10
73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS — 72

☐ 2. FACILITY HAS A RCRA PERMIT — 72

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	(T04)	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S			T/A	C
C	DUP			1
1	2 - 13		14	15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	T04	LIMITED ONLY BY NO. OF R.R. CARS AVAIL.			7				
2					8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. . . OR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

ELECTRIC FURNACE DUST IS INTERMIZED WITH NON-HAZARDOUS WASTES WHEN LOADED INTO RAILROAD CARS.
THE RESULTING COMPOSITE IS NON-HAZARDOUS.
THE AVERAGE R.R. CAR CAPACITY IS 50 TONS.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F	I	L	D	0	7	2	3	1	7	7	6	1		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
41 53 03 0	087 52 00 0

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
G. L. Winger	G L Winger	7/10/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
G. L. Winger	G L Winger	7/10/81

Continued from page 2.

NOTE: Photocopy this page before completing it, if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY														
S												T/A	C		S											T/A	C		
W	I	L	D	0	7	2	3	1	7	7	6	1		1	W	D	U	P									2	D	U	P
1	2											13	14	15	1	2											13	14	15	23		26

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	
1	D006	260	T	T04	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	

Please print or type in the unshaded areas only
(fill—in areas a e spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

ENVIRONMENTAL PROTECTION AGENCY

HAZ DOUS WASTE PERMIT APPLICATI

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F T T D 0 7 2 3 1 7 7 6 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	69	01	01

[X] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
81	07	10

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. **PROCESS DESIGN CAPACITY** — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	(T04)	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP T/A C 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G	
X-2	T03	20	E	
1	T04	~~LIMITED ONLY BY NO OF R.R. CARS AVAIL~~ 250	N	
	S03	~~250,000~~	Y	per amendment 10/1/84
3	S01	11,000	G	
4				
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS COD[illegible] R FOR DESCRIBING OTHER PROCESSES (code [illegible]4"). . OR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

ELECTRIC FURNACE DUST IS INTERMIZED WITH NON-HAZARDOUS WASTES WHEN LOADED INTO RAILROAD CARS.
THE RESULTING COMPOSITE IS NON-HAZARDOUS.
IE AVERAGE R.R. CAR CAPACITY IS 50 TONS.

The average container is 20 cubic yards.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing . . . ou have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
W I L D 0 7 2 3 1 7 7 6 1 — T/A: — C: 1	W — DUP — T/A: — C: 2 — DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	D006	260	T	T04 S03 ~~S01~~	per amendment 10-12-84
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

IV. DESCRIPTION OF HAZARDOUS W[illegible]ES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

1	2											T/A 13	C 14	
F	I	L	D	0	7	2	3	1	7	7	6	1		6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* H

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* B

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)									LONGITUDE (degrees, minutes, & seconds)								
4	1	5	3	0	3	0	0		0	8	7	5	2	0	0	0	
65	66	67	68	69	-	71			72	-	74	75	76	77	-	79	

VIII. FACILITY OWNER

X A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
C E 15 16 - 55	56 - 58 / 59 - 61 / 62 - 65

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F 15 16 - 45	C G 15 16 - 40	41 42	47 - 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

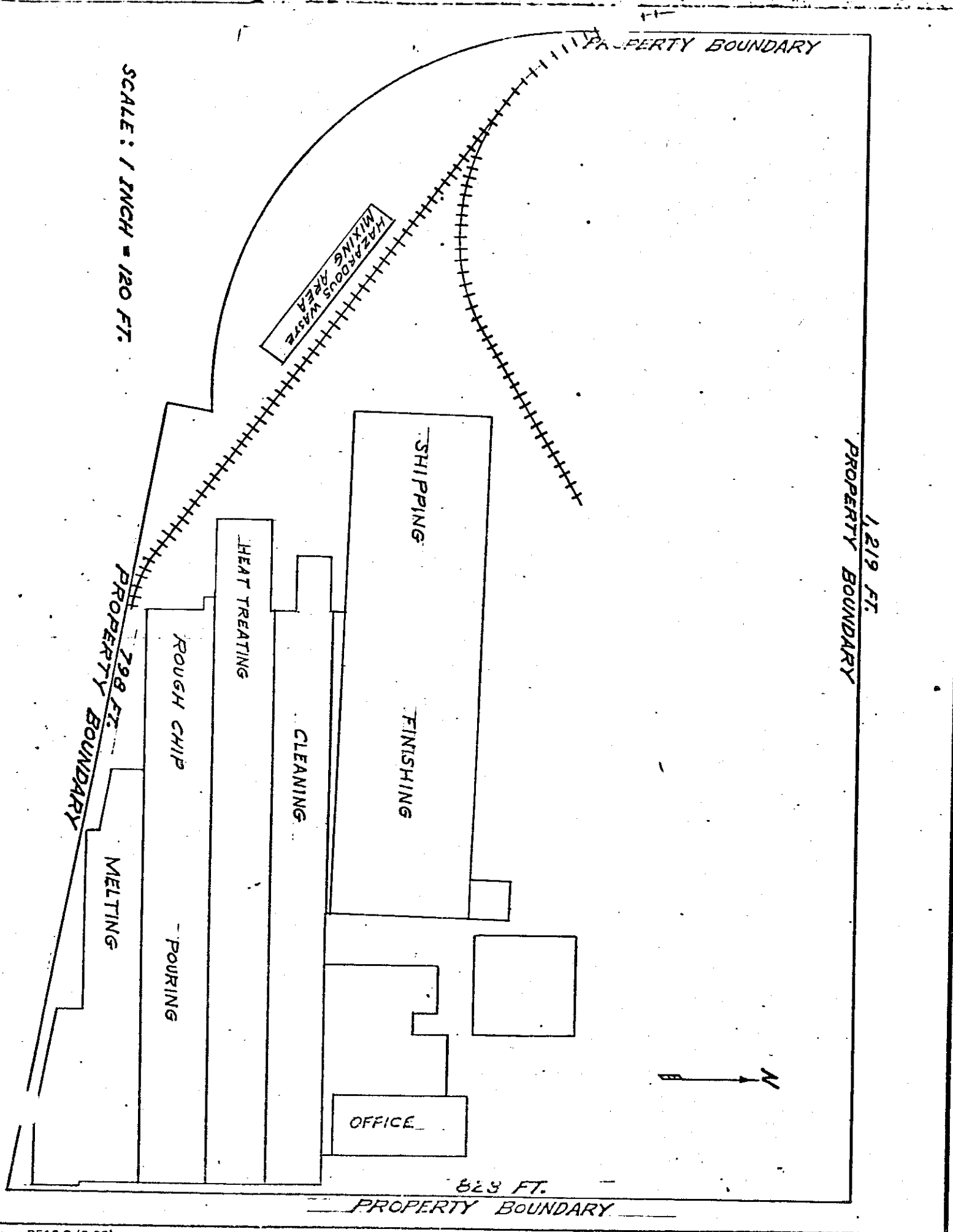
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
G. L. Winger	G. L. Winger	7/10/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
G. L. Winger	G. L. Winger	7/10/81

V. FACILITY DRAWING *(see page 4)*



MIDLANDROSS

July 14, 1981

CERTIFIED - RRR

Mr. Karl Klepitsch
Chief of Waste Management
United States EPA, Region 5
118 West Jackson
Chicago, Illinois 60604

Re: Midland-Ross Corporation, National Castings Division
Melrose Park Works - EPA No. ILD072317761
Cicero Works - EPA No. ILD049015134

Dear Mr. Klepitsch:

This letter is being written, and the enclosed submissions are being made, on the advice of Mr. Eugene Meyer of your office.

Each of the captioned facilities previously filed a Notification of Hazardous Waste Activity. Enclosed are renotification forms modifying the previous Notification to include on-site treatment of only the wastes the plants themselves generate. Also, included for each of the facilities is a completed "Part A Application" for a permit as a treatment facility. While the enclosed indicates that we intend to begin treatment operations on July 10, 1981. we will not begin such operations until your office has acknowledged receipt of the enclosed. It is my understanding from Mr. Meyer that we can expect to receive such an acknowledgement and begin treatment approximately one week from the date you receive this letter.

I would like to thank Region 5 and, more specifically, Mr. Meyer for the cooperation Midland-Ross has received in solving its hazardous waste problem in a most reasonable and orderly way. You and your staff should feel free to call me directly if you have any questions regarding the enclosed.

Very truly yours,

Michael R Babbitt

Michael R. Babbitt
Corporate Attorney
MRB/lsj
cc: E. Meyer, US EPA

JUL 15 1981

JOSEPH A. GUIMOND & ASSOCIATES, INC.
Consultants
80 N. Main St., Box 230, Sellersville, Pa. 18960 • (215) 257-5108

NATIONAL CASTINGS DIVISION
MIDLAND-ROSS CORPORATION

MELROSE PARK

ANALYTICAL REPORT FORM

Parameter	Composite A
Arsenic	0.014 mg/1
Zinc	9.3 mg/1
Barium	0.25 mg/1
Cadmium	0.41 mg/1
Chromium	0.20 mg/1
Mercury	0.0002 mg/1
Selenium	0.032 mg/1
Lead	<0.10 mg/1
Silver	0.04 mg/1

The Leachate was prepared in accordance with the E.P. Toxicity Test Method described in the May 19, 1980 Federal Register.

JOSEPH A. GUIMOND & ASSOCIATES, INC.
SELLERSVILLE, PA. 18960

NATIONAL CASTINGS DIVISION
MIDLAND-ROSS CORPORATION

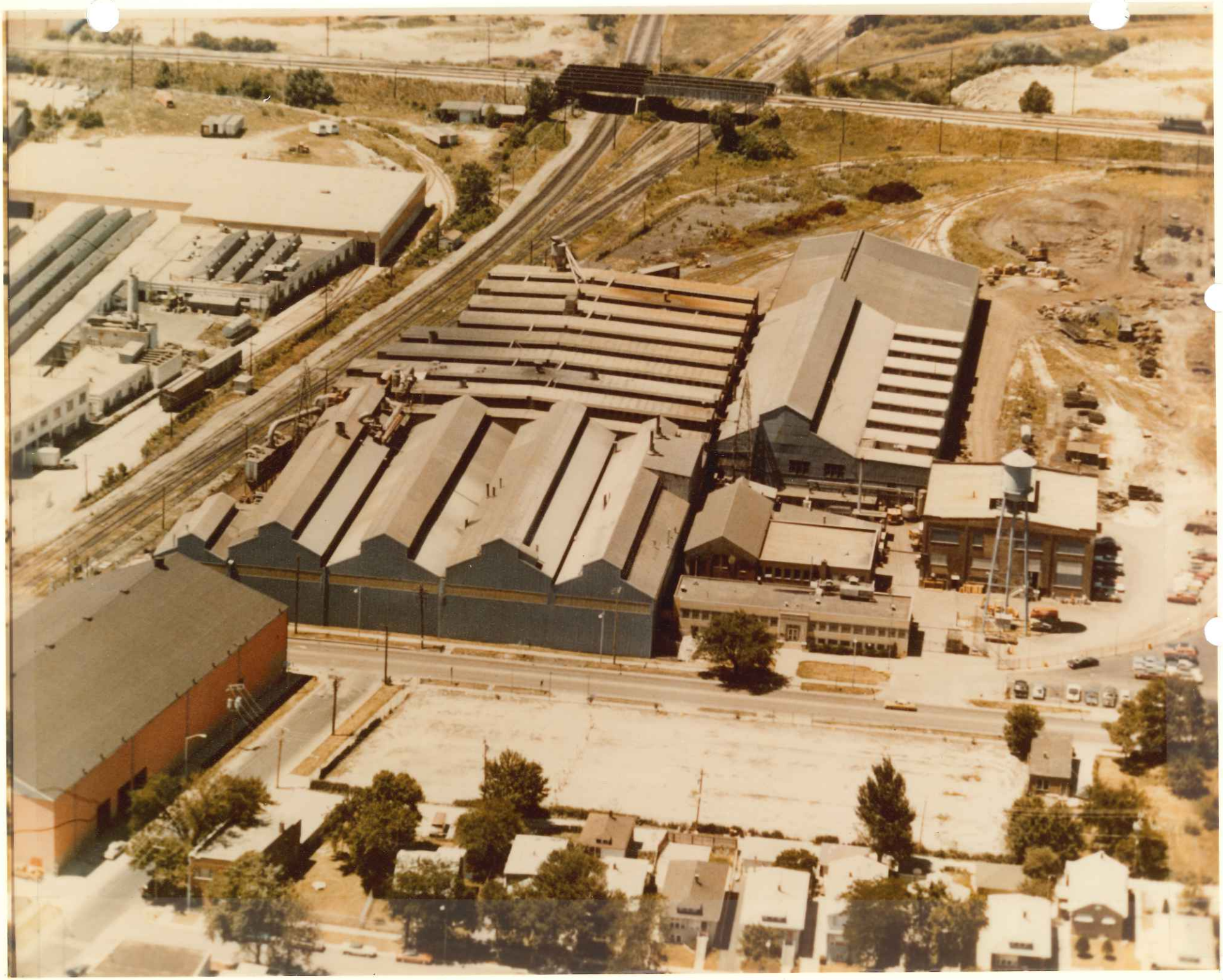
MELROSE PARK

EP TOXICITY - SUBSTANCE	Composition A		
	Max. Allowable Level	Actual Concentration	In Compliance?
Arsenic	5 mg/l	0.014	Yes
Barium	100 mg/l	0.25	Yes
Cadmium	1 mg/l	0.41	Yes
Chromium	5 mg/l	0.20	Yes
Lead	5 mg/l	<0.10	Yes
Mercury	0.2 mg/l	0.0002	Yes
Selenium	1 mg/l	0.032	Yes
Silver	5 mg/l	0.04	Yes
Zinc	---	9.3	Yes

EP Toxicity per IP 261.24, Table 1

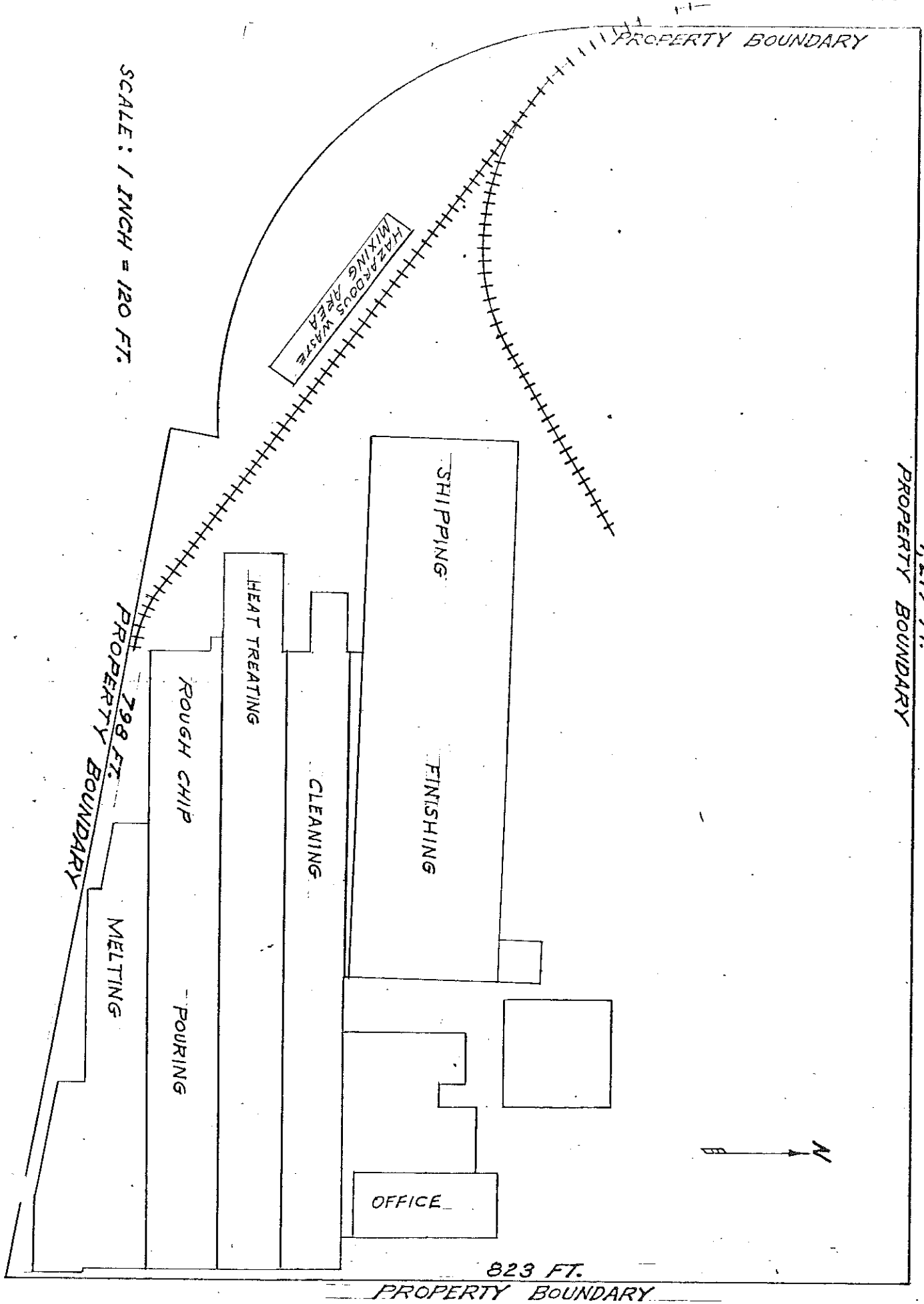
Solid waste samples analyzed by Free-Col Division of Meadville, Pennsylvania.

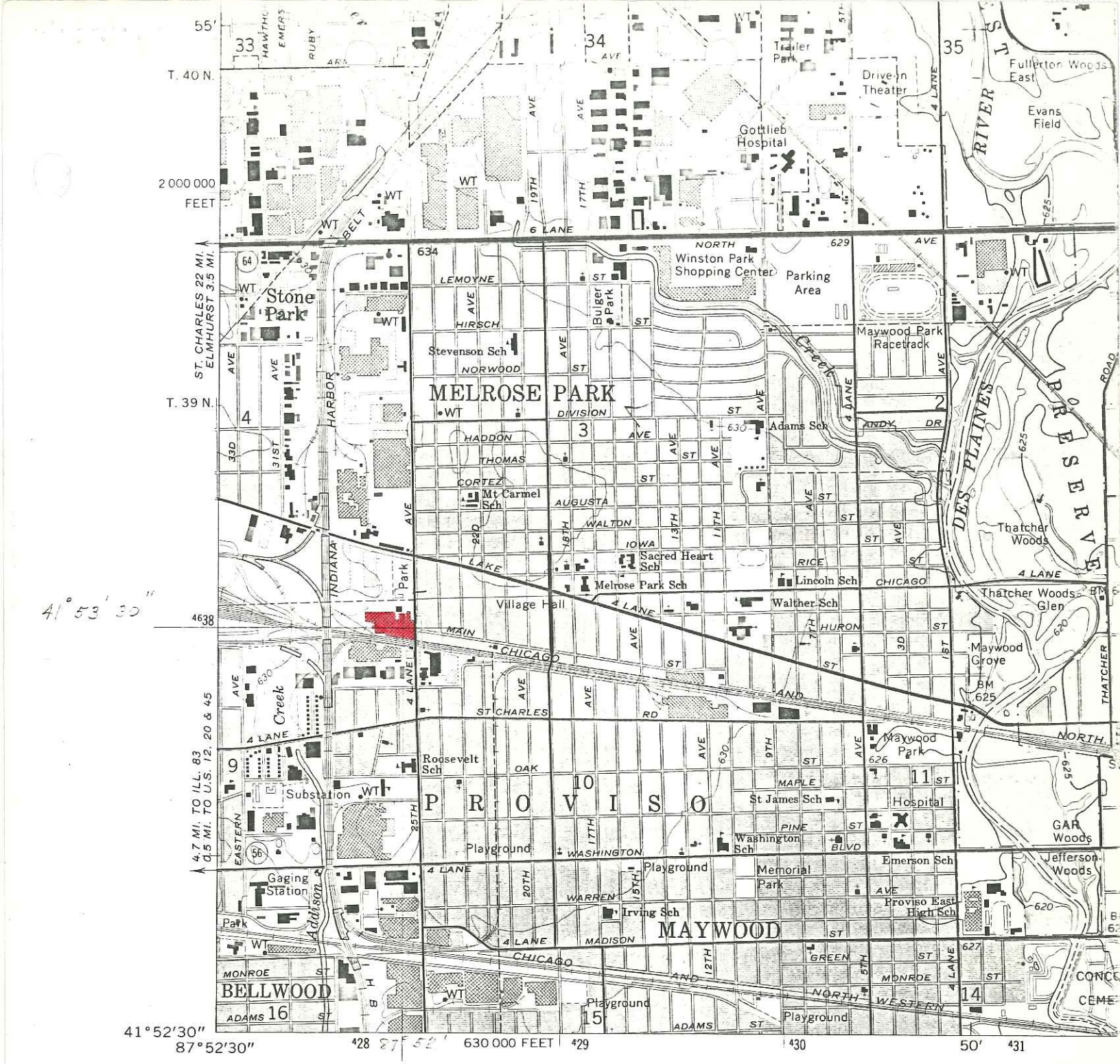
Composition A:
5% Furnace Dust
10% Furnace Slag
5% Sand System Dust Collector
5% Shotblast Fines
5% Shotblast Dust Collector
70% Waste Sand
100%



Form Approved OMB No. 155 S80004

V. FACILITY DRAWING *(see page 4)*





(HINSDALE) 3467 IV SW

Mapped, edited, and published by the Geological Survey in cooperation with State of Illinois Geological Survey

Control by USGS, USC&GS, City of Chicago, and Cook County Highway Department

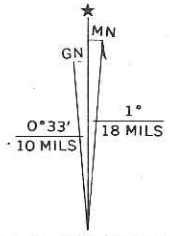
Planimetry by photogrammetric methods from aerial photographs taken 1962–63. Topography by planetable surveys 1924–25 Revised 1963

Polyconic projection. 1927 North American datum
10,000-foot grid based on Illinois coordinate system, east zone
1000-meter Universal Transverse Mercator grid ticks, zone 16, shown in blue

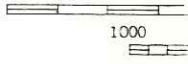
Red tint indicates areas in which only landmark buildings are shown

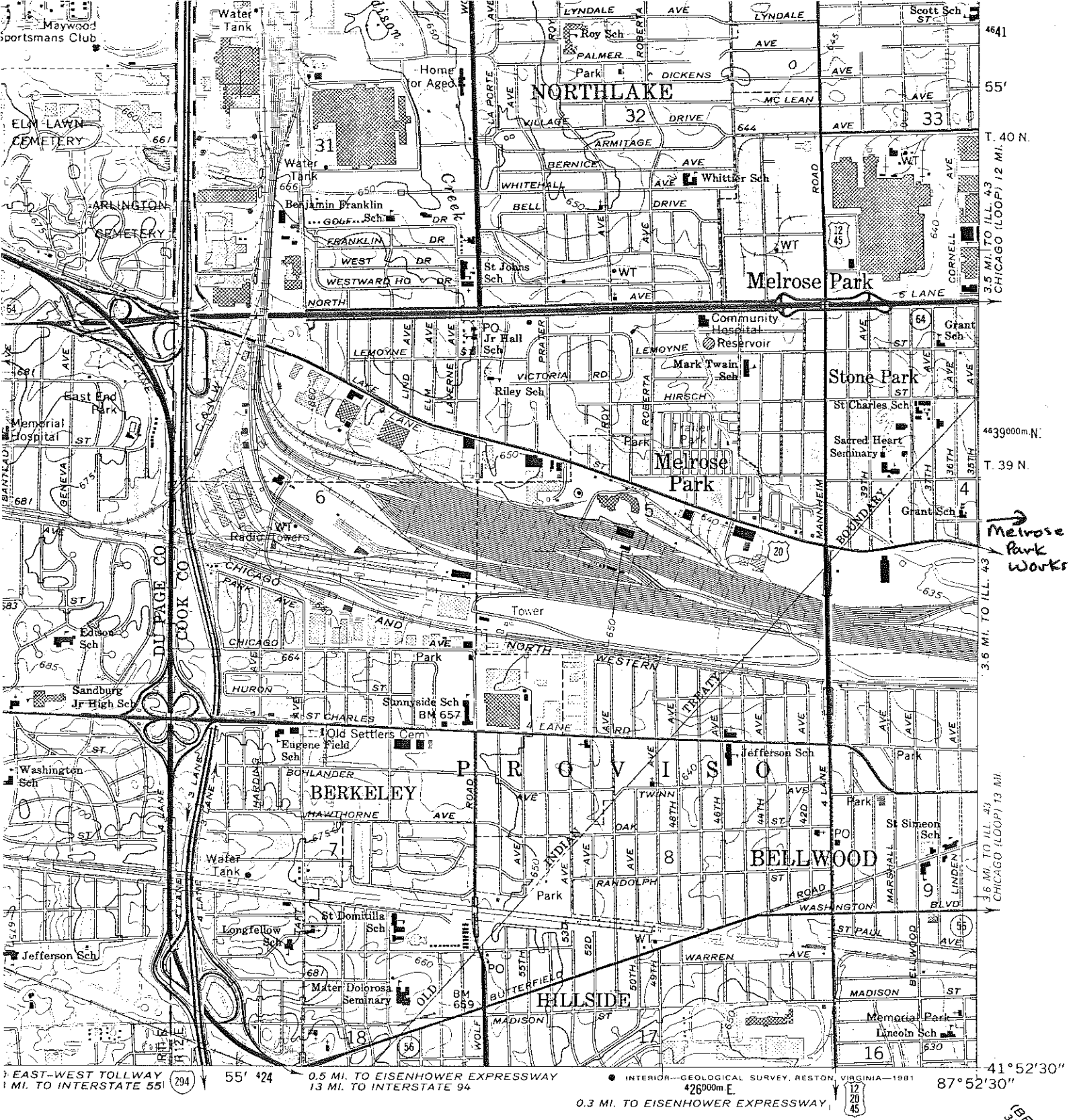
Revisions shown in purple compiled from aerial photographs taken 1972. This information not field checked

Purple tint indicates extension of urban areas



UTM GRID AND 1972 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET





1 MILE
6000 7000 FEET
1 KILOMETER

ROAD CLASSIFICATION

Heavy-duty ——— Light-duty ———
Medium-duty ——— Unimproved dirt - - - - - -
Interstate Route U. S. Route State Route

ILLINOIS

QUADRANGLE LOCATION

STANDARDS
VIRGINIA 22092
, ILLINOIS 61801
VAILABLE ON REQUEST

ELMHURST, ILL.
N4152.5—W8752.5/7.5

1963

DMA 3467 IV NW—SERIES V863

A.4 Closure

MIDLANDROSS

ILD-872-317-761

March 31, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RECEIVED
APR 3 1986
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

Regional Administrator
United States Environmental Protection Agency
Region V
Federal Building
230 South Dearborn
Chicago, Illinois 60604

Re: RCRA - T/S/D Facilities
Financial Responsibility for Closure

Dear Sir:

Enclosed for filing with your Region are the financial mechanisms required by the States of Ohio and Illinois supporting this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265. It is our understanding from conversations with your staff that providing you with these filings fully meets our federal filing obligations in this regard.

Very truly yours,

Michael R. Babbitt
Senior Corporate Attorney

DJG/mlb
Enclosures

O. WMD ✓
cc: RF (Ltr.)

MIDLANDROSS

March 31, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Director
Illinois Evironmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Financial Responsibility Requirements
Midland-Ross Corporation
Cicero Works - ID# ILD049015134
Melrose Park Works - ID# ILD072317761

Dear Sir or Madam:

Enclosed for filing with the Illinois EPA as evidence of this firm's financial responsibility for closure costs relative to the captioned facilities are the following documents:

1. Letter from this firm's Chief Financial Officer;

2. Letter from this firm's independent accounting firm; and

3. A copy of the 1985 Annual Report to Shareholders.

Very truly yours,

Michael R. Babbitt
Senior Corporate Attorney

MRB/mlb
Enclosures

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate
both liability coverage and assurance of closure
and/or post-closure care.)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Sir or Madam:

I am the chief financial officer of Midland-Ross Corporation (1)

This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure (2) as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725:

USEPA I.D. No. 049015134

Name Cicero Works (3)

Address 1400 South Laramie Avenue, Cicero, Illinois 60650

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
USEPA I.D. No. 049015134 (5)			
Name Cicero Works			
Address 1400 South Laramie Avenue	2,913.06		2,913.06
City Cicero, Illinois 60650			
USEPA I.D. No. 072317761			
Name Melrose Park Works			
Address 110 North 25th Avenue	29,924.00		29,924.00
City Melrose Park, Illinois 60160			

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 21(f). Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed $25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to $25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13)

Alternative I

1.	Amount of annual aggregate liability coverage to be demonstrated	$
*2.	Current assets	$
3.	Current liabilities	$
4.	Net working capital (line 2 minus line 3)	$
*5.	Tangible net worth	$
*6.	If less than 90% of assets are located in the U.S., give total U.S. assets	$

		Yes	No
7.	Is line 5 at least $10 million?		/
8.	Is line 4 at least 6 times line 1?		/
9.	Is line 5 at least 6 times line 1?		/
*10.	Are at least 90% of assets located in the U.S.? If not, complete line 11.		/
11.	Is line 6 at least 6 times line 1?		/

Signature

Typed name

Title

Date

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13)

Alternative II

1.	Amount of annual aggregate liability coverage to be demonstrated	$ 6,038,728.78
2.	Current bond rating of most recent issuance and name of rating service	A-Standard&Poor Baa2, Moody's
3.	Date of issuance of bond	February 25, 198
4.	Date of maturity of bond	February 15, 200
*5.	Tangible net worth	$225,408,000.00
*6.	Total assets in U.S. (required only if less than 90% of assets are located in U.S.)	$619,639,000.00

		Yes	No
7.	Is line 5 at least $10 million?	X	/
8.	Is line 5 at least 6 times line 1?	X	/
*9.	Are at least 90% of assets located in the U.S.? If not, complete line 10.		/ X
10.	Is line 6 at least 6 times line 1?	X	/

Signature E C Gendron

Typed name Edward C. Gendron

Title Vice Chairman & Chief Administrative Officer

Date March 31, 1986

Ernst & Whinney

1300 Huntington Building
Cleveland, Ohio 44115

216/861-5000

March 31, 1986

Mr. Edward C. Gendron
Vice Chairman and Chief
Administrative Officer
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

Dear Mr. Gendron:

We have read your letter dated March 31, 1986, to the Director, Illinois Environmental Protection Agency, Springfield, Illinois. We have examined the consolidated financial statements of Midland-Ross Corporation and subsidiaries for the year ended December 31, 1985, and have issued our report thereon dated January 20, 1986. We have compared the amounts of tangible net worth and total assets in the United States listed under the caption, Alternative II, lines 5 and 6, with the corresponding amounts included in or derived from such audited consolidated financial statements.

In connection with the procedure, no matters came to our attention which caused us to believe that the amounts shown on lines 5 and 6 should be adjusted.

Very truly yours,

Ernst & Whinney

MIDLANDROSS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

March 31, 1986

Ohio Environmental Protection Agency
Division of Hazardous Materials Management
361 East Broad Street
Columbus, Ohio 43216-1049

Attention: Ms. Debra L. Tegtmeyer

Re: Financial Responsibility Requirements
Midland-Ross Corporation,
Surface Combustion Division
(Formerly Energy Technology Division)
03-48-0650/OHD 09 7232946

Dear Sir or Madam:

Enclosed for filing with the Ohio EPA as evidence of this firm's financial responsibility for liability coverage and closure costs relative to the captioned facility are the following documents:

1. Letter from this firm's Chief Financial Officer,

2. Letter from this firm's independent accounting firm; and

3. A copy of this firm's annual report to shareholders;

Very truly yours,

Michael R. Babbitt
Senior Corporate Attorney

MRB/mlb
Enclosures

MIDLANDROSS

March 31, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Director
Ohio Environmental Protection Agency
361 East Broad Street
Columbus, Ohio 43215

Re: Financial Responsibility Requirements
Midland-Ross Corporation
Surface Combustion Division
(Formerly Energy Technology Division)
03-48-0650/OHD 09 7232946

Dear Sir or Madam:

I am the chief financial officer of Midland-Ross Corporation, 20600 Chagrin Boulevard, Cleveland, Ohio 44122. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure care, as specified in Chapters 3745-55 and 3745-66 of the Administrative Code.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code:

Surface Combustion Division 2375 Dorr Street Toledo, Ohio	OHD 097232946/ Ohio Permit: 03-48-0650

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

NAME	I.D.#	CLOSURE COSTS
Surface Combustion Div. 2375 Dorr Street Toledo, Ohio	OHD 097232946/ Ohio Permit: 03-48-0650	$ 5,891.72
	TOTAL	$ 5,891.72

MIDLANDROSS

Re: Financial Responsibility Requirements
Midland-Ross Corporation
Surface Combustion Division
(Formerly Energy Technology Division)
03-48-0650/OHD 09 7232946

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Chapters 3745-55 and 3745-66 of the Administrative Code, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None .

3. In States where U.S. EPA or a State so authorized is administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Chapters 3745-55 and 3745-66 of the Administrative Code. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

NAME	I.D.#	CLOSURE COSTS
Cicero Works Chicago, Illinois	ILD 049015134	2,913.06
Melrose Park Works	ILD 072317761	29,924.00
	TOTAL	$32,837.06

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated to the Director through the financial test or any other financial assurance mechanism specified in Chapters 3745-55 or 3745-66 of the Administrative Code. The current closure and/or postclosure cost estimates not covered by such financial assurance are shown for each facility: None.

MIDLANDROSS

Re: Financial Responsibility Requirements
Midland-Ross Corporation
Surface Combustion Division
(Formerly Energy Technology Division)
03-48-0650/OHD 09 7232946

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterick are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

Part B. CLOSURE AND LIABILITY COVERAGE

ALTERNATIVE II

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 38,728.78
2.	Amount of annual aggregate liability coverage to be demonstrated	$6,000,000.00
3.	Sum of lines 1 and 2	$6,038,728.78
4.	Current bond rating of most recent issuance and name of rating service	A-, Standard & Poor's Baa2, Moody's
5.	Date of issuance of bond	February 25, 1982
6.	Date of maturity of bond	February 15, 2007
7.	Tangible net worth	$225,408,000.00
8.	Total assets in U.S.	$619,639,000.00

MIDLANDROSS

Re: Financial Responsibility Requirements
Midland-Ross Corporation
Surface Combustion Division
(Formerly Energy Technology Division)
03-48-0650/OHD 09 7232946

		Yes	No
9.	Is line 7 at least $10 million?	X	
10.	Is line 7 at least six times line 3?	X	
11.	Are at least 90% of assets located in the U.S.? If not, complete line 12		X
12.	Is line 8 at least six times line 3?	X	

I hereby certify that the wording of this letter is identical to the wording specified in Paragraph (G) of Rule 3745-55-51 of the Administrative Code as such regulations were constituted on the date shown immediately below.

Edward C. Gendron
Vice Chairman and
Chief Administrative Officer

Date: March 31, 1986

Ernst & Whinney

1300 Huntington Building
Cleveland, Ohio 44115

216/861-5000

March 31, 1986

Mr. Edward C. Gendron
Vice Chairman and Chief
Administrative Officer
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

Dear Mr. Gendron:

We have read your letter dated March 31, 1986, to the Director, Ohio Environmental Protection Agency, Columbus, Ohio. We have examined the consolidated financial statements of Midland-Ross Corporation and subsidiaries for the year ended December 31, 1985, and have issued our report thereon dated January 20, 1986. We have compared the amounts of tangible net worth and total assets in the United States listed under the caption, Alternative II, lines 7 and 8, with the corresponding amounts included in or derived from such audited consolidated financial statements.

In connection with the procedure, no matters came to our attention which caused us to believe that the amounts shown on lines 7 and 8 should be adjusted.

Very truly yours,

Ernst & Whinney

ILD 072 317 761

MIDLAND ROSS

Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122
(216) 491-8400

March 29, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ADDITIONAL INFORMATION
IS FILED WITH
OHD 097 232 946

Regional Administrator
United States Environmental Protection Agency
Region V
Federal Building
230 South Dearborn
Chicago, Illinois 60604

Re: RCRA - T/S/D Facilities
Financial Responsibility for Closure

Dear Sir:

Enclosed for filing with your Region are the financial mechanisms required by the States of Ohio and Illinois supporting this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265. It is our understanding from conversations with your staff that providing you with these filings fully meets our federal filing obligations in this regard.

Very truly yours,

Michael R. Babbitt
Senior Corporate Attorney

DJG/mlb
Enclosures

ILD 072 317 761

☒ CALIFORNIA UNION [INSU]RANCE COMPANY

☐ ILLINOIS UNION INSURANCE COMPANY

☐

(HEREINAFTER CALLED THE COMPANY)

NOTICE OF CANCELLATION, NON-RENEWAL, OR REDUCTION IN COVERAGE

DATE OF MAILING 2-17-83

Midland Ross Corporation, Etal
20600 Chagrin Blvd.
Cleveland, OHio 44122
Attn: David Duran

NAME AND ADDRESS ~~MORTGAGEE~~

Regional Administrator
c/o Thomas Golz
Waste Management Branch
230 South Dearborn Street
Chicago, ILL. 60604

NAME AND ADDRESS OF PRODUCER

McAlear Associates, Inc.
4450 Cascade Road, S.E.
Grand Rapids, Mich. 49506

This is to notify you that the numbered insurance policy: ZCV 006206

(Applicable item marked ☑) EPA Certification cancellation requirement
EPA ID #'s, ILD-049015134, ILD-072317761, OHD-097232946 & MID-006021661.

☐ is cancelled effective ________________, at the same time of day the policy became effective. This notice is based on the following statutory grounds:

☐ is cancelled effective ________________, at the same time of day the policy became effective:

☐ will not be renewed or continued in force at its expiration or anniversary date. If the policy was issued for a term of more than one year, or without a fixed expiration date, it is hereby amended to show the following expiration date: ________ at the same time of day as the coverage became effective.

Upon written request, the Company will furnish the facts upon which this notice is based.

☐ will be amended, on renewal, or on the next anniversary date, to provide reduced coverage or limits of liability as follows:

X Only the Hazardous Waste Facility Certificate of Pollution Liability Insurance is cancelled effecgive- APRIL 9, 1983. The Firemans Fund Insurance Company, Policy Number LA-2940052 will certify financial requirements.

Excess (if any) of paid premium over the pro rata premium for the expired time will be refunded on demand, if not tendered herewith. If the premium has not been paid, a bill for the premium earned to the time of termination will be forwarded in due course.

MY/jn/2/17/83

By [signature] AUTHORIZED AGENT Representative

RECEIVED
MAR 01 1983
WASTE MANAGEMENT BRANCH

To Mortgagee Or Loss Payee:

You are hereby notified that the agreement under the mortgage clause or loss payable clause, which is a part of the above policy, issued to the above insured, is hereby cancelled (or terminated) in accordance with the conditions of the policy, said cancellation (or termination) to be effective on and after the hour and date mentioned above.

By ________________
AUTHORIZED AGENT

Return one copy to the Company without delay and
FOR ORDINARY MAIL CANCELLATION NOTICE
Attach Post Office Department Receipt Form here
or
FOR CERTIFIED MAIL CANCELLATION NOTICE
Attach Restricted Delivery Receipt here
or
FOR REGISTERED MAIL CANCELLATION NOTICE
Attach both tissue paper Registered Mail Receipt and Registered Letter Receipt Card here

I hereby certify that I personally mailed in the U.S. Post Office at the place and time stamped hereon, a notice of cancellation, or non-renewal an exact carbon copy of which appears above, and at said time received from the U.S. Post Office the receipt Form hereto attached.

Signed this ________ day of ________ 19____

Signature ________________

IMPORTANT — Notice must also be sent to the Loss Payee(s), or Mortgagee(s) named in the Policy.

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate
both liability coverage and assurance of closure
and/or post-closure care.)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Sir or Madam:

I am the chief financial officer of Midland-Ross Corporation (1).

This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure (2) as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725:

USEPA I.D. No. 049015134

Name Cicero Works (3)

Address 1400 South Laramie Avenue, Cicero, Illinois 60650

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
USEPA I.D. No. 049015134 (5) Name Cicero Works Address 1400 South Laramie Avenue City Cicero, Illinois 60650	2,913.06		2,913.06
USEPA I.D. No. 072317761 Name Melrose Park Works Address 110 North 25th Avenue City Melrose Park, Illinois 60160	29,924.00		29,924.00

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 21(f). Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed $25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to $25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

Part A. Liability Coverage for Accidental Occu ces (See Instruction 12 and (13)

Alternative I

1.	Amount of annual aggregate liability coverage to be demonstrated	$_____
2.	Current assets	$_____
3.	Current liabilities	$_____
4.	Net working capital (line 2 minus line 3)	$_____
*5.	Tangible net worth	$_____
*6.	If less than 90% of assets are located in the U.S., give total U.S. assets	$_____

		Yes	No
7.	Is line 5 at least $10 million?	_____	_____
8.	Is line 4 at least 6 times line 1?	_____	_____
9.	Is line 5 at least 6 times line 1?	_____	_____
*10.	Are at least 90% of assets located in the U.S.? If not, complete line 11.	_____	_____
11.	Is line 6 at least 6 times line 1?	_____	_____

Signature _____

Typed name _____

Title _____

Date _____

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and (13)

Alternative II

1.	Amount of annual aggregate liability coverage to be demonstrated	$ 6,038,728.78
2.	Current bond rating of most recent issuance and name of rating service	A-Standard&Poor Baa2, Moody's
3.	Date of issuance of bond	February 25, 198
4.	Date of maturity of bond	February 15, 200
*5.	Tangible net worth	$225,408,000.00
*6.	Total assets in U.S. (required only if less than 90% of assets are located in U.S.)	$619,639,000.00

		Yes	No
7.	Is line 5 at least $10 million?	X	_____
8.	Is line 5 at least 6 times line 1?	X	_____
*9.	Are at least 90% of assets located in the U.S.? If not, complete line 10.	_____	X
10.	Is line 6 at least 6 times line 1?	X	_____

Signature Edward C. Gendron

Typed name Edward C. Gendron

Title Vice Chairman & Chief Administrative Officer

Date March 31, 1986

Ernst & Whinney

1300 Huntington Building
Cleveland, Ohio 44115

216/861-5000

March 31, 1986

Mr. Edward C. Gendron
Vice Chairman and Chief
Administrative Officer
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

Dear Mr. Gendron:

We have read your letter dated March 31, 1986, to the Director, Illinois Environmental Protection Agency, Springfield, Illinois. We have examined the consolidated financial statements of Midland-Ross Corporation and subsidiaries for the year ended December 31, 1985, and have issued our report thereon dated January 20, 1986. We have compared the amounts of tangible net worth and total assets in the United States listed under the caption, Alternative II, lines 5 and 6, with the corresponding amounts included in or derived from such audited consolidated financial statements.

In connection with the procedure, no matters came to our attention which caused us to believe that the amounts shown on lines 5 and 6 should be adjusted.

Very truly yours,

Ernst & Whinney

Liabilities and Shareholders' Equity		(In Thousands of Dollars)
December 31	1985	1984
Current Liabilities		
Accounts and notes payable	$ 55,844	$ 57,560
Short-term borrowings—Note D	25,195	2,100
Advance billings on contracts in process	32,551	35,404
Accrued compensation and benefits	15,761	17,933
Accrued pension costs	8,033	8,187
Other liabilities	49,723	52,427
Dividends payable	4,689	4,857
Income taxes	11,834	13,150
Current portion of long-term debt	5,241	4,163
Total Current Liabilities	208,870	195,781
Long-term Debt—Note D	149,139	152,902
Other Long-term Liabilities	37,316	53,006
Deferred Income Taxes	8,816	3,361
Note Payable with Proceeds from Common Stock—Note E	30,000	30,000
Shareholders' Equity—Notes D, E, F and G		
Capital stock		
Serial preferred	45,560	69,560
Common (13,731,709 and 12,970,951 shares outstanding at December 31, 1985 and 1984, respectively)	68,659	64,855
Additional paid-in capital	33,659	24,672
Retained earnings	123,400	123,259
Translation adjustment	(13,534)	(18,730)
	257,744	263,616
	$691,685	$698,666

See notes to consolidated financial statements.

Report of Ernst & Whinney, Independent Auditors

Shareholders and Board of Directors
Midland-Ross Corporation
Cleveland, Ohio

We have examined the consolidated balance sheet of Midland-Ross Corporation and subsidiaries as of December 31, 1985 and 1984, and the related consolidated statements of operations, shareholders' equity and changes in financial position for each of the three years in the period ended December 31, 1985. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of Midland-Ross Corporation and subsidiaries at December 31, 1985 and 1984, and the consolidated results of their operations and changes in their financial position for each of the three years in the period ended December 31, 1985, in conformity with generally accepted accounting principles applied on a consistent basis.

Ernst & Whinney

Cleveland, Ohio
January 20, 1986

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

OCT 10 2001

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Wilbur G. Streams
Senior Vice President
ABC-NACO, Inc.
335 Eisenhower Lane South
Lombard, Illinois 60148

Re: Compliance Evaluation Inspection
EPA I.D. No.: ILD 072 317 761

Dear Mr. Streams:

On March 28, 2001, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected ABC-NACO, Inc. located in Melrose Park, Illinois, (the facility). The purpose of the inspection was to evaluate your facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically the Standards Applicable to Generators of Hazardous Waste set forth at 35 Illinois Administrative Code part 722 and 40 CFR Part 262. Enclosed please find a copy of our inspection report dated September 26, 2001.

As of this writing, based upon information available to U.S. EPA, the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. U.S. EPA and the Illinois Environmental Protection Agency will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Robert Dean Smith, of my staff, at (312) 886-7568.

Sincerely,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

cc: Todd Marvel, Illinois EPA (w/ encl.)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	ABC-NACO, National Castings Division ILD 072 317 761
FACILITY ADDRESS:	110 North 25th Avenue Melrose Park, Il 60160
OPERATOR:	ABC-NACO
FACILITY TYPE:	Large Quantity Generator
FACILITY REPRESENTATIVES:	Jerry Farmer, Consultant John Hall, Industrial Engineering Manager
USEPA INSPECTOR:	Robert Dean Smith Environmental Scientist
DATE OF INSPECTION:	March 28, 2001
SIC CODE:	3325
INSPECTION PRIORITY, SECTOR AND/OR PROCESS:	Greater Chicago Initiative
Wastes:	Cadmium and Lead

Background

On November 17, 1980, National Castings Division, Midland-Ross Corp. (NC), submitted a Notification of Hazardous Waste Activity (Notification). NC identified itself as a generator of hazardous waste. On July 10, 1981, NC submitted both a subsequent Notification which added "treat/store/dispose" to the facilities activities and a RCRA "Part A Permit" application. On August 5, 1986, NC submitted a closure plan for the facility's hazardous waste storage area and on March 7, 1988, the Illinois Environmental Protection Agency approved the closure plan. In 1999, the company became "ABC-NACO" because of a merger.

ABC-NACO is a steel casting foundry where scrap steel is melted and refined in electric arc furnaces and poured into sand molds. The primary product included castings used in the railroad manufacturing industry. The 20 acre facility operated from 1909 until November 22, 2001, when ABC-NACO made its last casting.

ABC-NACO generated hazardous waste baghouse dust with the Toxicity Characteristic Leaching Procedure (TCLP) characteristic of cadmium, D006.

The current number of employees at the facility is 44, down from 344 when PRC Environmental Management (PRC) conducted a

Preliminary Assessment/ Visual Site Inspection (PA/VSI) in August 1993. ABC-NACO's 44 employees grind and finish parts manufactured in Mexico or Canada. At the time of the inspection, NC was removing equipment from the facility that is not associated with the grinding operations.

Regulatory background

ABC-NACO is a large quantity generator of hazardous waste. The State of Illinois modified the generator regulations found in 40 CFR 262 by moving the following subsection to the beginning of IAC 722.134: "a generator is exempt from all the requirements in 35 Ill. Adm. Code 725.Subparts G and H, except for 35 Ill. Adm. Code 725.211 and 725.214". This subsection in the Federal regulations seem to apply only to generators who have containment buildings. However, by moving this statement to the beginning of the section, Illinois has made generators of hazardous waste subject to a minimum amount of closure activities of its hazardous waste units.

Specifically the following two closure sections found in IAC §725 apply to ABC-NACO:

Section 725.211 Closure Performance Standard

The owner or operator shall close the facility in a manner that:

a) Minimizes the need for further maintenance; and

b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground or surface waters or to the atmosphere, and

c) Complies with the closure requirements of this Part, including, but not limited to, the requirements of Sections 725.297, 725.328, 725.358, 725.380, 725.410, 725.451, 725.481, 725.504 and 725.1102.

(Source: Amended at 17 Ill. Reg. 20620, effective November 22, 1993)

And

Section 725.214 Disposal or Decontamination of Equipment, Structures and Soils

During the partial and final closure periods, all contaminated equipment, structures and soil must be properly disposed of, or decontaminated unless specified otherwise in Sections 725.297, 725.328, 725.358, 725.380 or 725.410. By removing all hazardous wastes or hazardous constituents during partial and final closure, the owner or operator may become a generator of hazardous waste and shall handle that hazardous waste in accordance with all applicable requirements of 35 Ill. Adm. Code 722.

(Source: Amended at 13 Ill. Reg. 18354, effective November 13, 1989)

Consequently, ABC-NACO must clean all hazardous waste accumulation units and clean all equipment and dispose of all hazardous waste. ABC-NACO accumulated hazardous waste in containers, thus, only the two above regulations apply. For example, IAC 725.211(c) requires a facility to comply with the regulations associated with their specific hazardous waste management practices. Thus, generators who accumulate in tanks must comply with IAC 725.297 and those who have surface impoundments must comply with IAC 725.328.

Inspection

The U.S. EPA inspector met Mr. Jerry Farmer and Mr. John Hall at the Melrose Park facility at 8:00. During the inspection at the Cicero facility on March 27, 2001, Mr. Farmer had informed the inspector that the Melrose Park facility had been shut down on November 22, 2000. The Melrose Park facility inspection, therefore, was to determine if any hazardous waste still remained at the facility.

A short discussion with Mr. Hall and Mr. Farmer preceded an inspection of the baghouse and associated dust collectors. Mr. Farmer stated that the facility was under a "Phase 1 Assessment" regarding plant closure. He was unsure of what "Phase 1 Assessment" meant but would find out and return to me with the information.

After the discussion, the ABC-NACO representatives and the U.S. EPA inspector inspected the hazardous waste baghouse and collectors located on the south side of the facility next to the Union Pacific West Line Rail Road Tracks.

The baghouse and collectors are identified as Solid Waste Management Unit number 1 in the Preliminary Assessment/Visual Site Assessment conducted by PRC in a report dated March 1994. The unit consists of baghouses and three separate dust collectors.

For the purposes of this report, the dust collectors are numbered from west to east. The first two dust collectors served the electric arc furnace and the third collected dust from above the furnaces. Dust collector number one contained numerous empty tote bags. The tote bags are reusable, white in color, and are very durable. One tote bag had a small amount of reddish-brown dust on it. The floor of the dust collector had a trace of reddish-brown dust. The amount was difficult to determine but would not fill a 5 gallon bucket.

The second dust collector was also filled with empty, reusable tote bags. The floor of this dust collector also had a small accumulation of reddish-brown dust.

The third dust collector was found to have a tote bag still attached to the pipe that fed the dust collector. The tote bag was approximately 1/5 full. The dust collector had other empty tote bags stored within the dust collector.

The inspector commutes on the Union Pacific Railroad West Line that passes about 30 feet south of the hazardous waste baghouses and dust collectors at the Melrose Park facility. On Thursday, April 4, 2001, during the inspector's commute home, the inspector observed the eastern most bag house's door was open and the tote that was 1/5 full was no longer in the dust collector. The tote was no where to be seen.

Hazardous waste manifests

Mr. Jerry Farmer faxed copies of the last three hazardous waste manifests for this facility to the inspector on March 28, 2001. These copies are attached.

Manifest number 4563216
20 cubic yards of dust, characterized as "RQ" Hazardous Waste Solid NOS 9, NA 3077, PG 111, (D006) (D007) (D008), was sent to Envirite of Illinois on 09/21/00.

Manifest Number 4563217
20 cubic yards of dust, characterized as "RQ" Hazardous Waste Solid NOS 9, NA 3077, PG 111, (D006) (D007) (D008), was sent to Envirite of Illinois on 12/04/00.

Manifest Number 4563218
20 cubic yards of dust, characterized as "RQ" Hazardous Waste Solid NOS 9, NA 3077, PG 111, (D006) (D007) (D008), was sent to Envirite of Illinois on 01/17/01.

The waste was generated from the last casting operation as well as plant shutdown procedures.

Findings from RCRA §3007 Information Request

U.S. EPA sent a RCRA §3007 Information Request to ABC-NACO on July 27, 2001, seeking information that was not available during the inspection. The questions regarding the Melrose Park facility related to the closure activities at the facility since the inspection.

The following waste has been removed from the Melrose Park Facility since the U.S. EPA inspection:

- 4/4/01, IL4563219, to Envirite, Harvey, IL, D006/D007/D008, one bag, "4 units of weight"; and D006/D007/D008, 1 bag, "4 units of weight", debris.
- 5/16/01, IL9664054, to Envirite, Harvey, IL, D006/D007/D008, 20 cubic yards, of debris. These are the dust collector bags which were shipped to Envirite on 5/17/01. A faxed certificate of disposal is included.
- 5/21/01, IL9664096, to Envirite, Harvey, IL, D006/D007/D008, 20 cubic yards of waste.
- 6/19/01, IL9664118, to Envirite, Harvey, IL, D006/D007/D009, 20 cubic yards of waste to Envirite.
- 7/30/01, IL9664124, to Envirite, Harvey, IL, D006/D008, 10 cubic yards of waste.
- 7/18/01, TX02612183, to Treatment One of Houston, Tx, waste paint (3 drums), formaldehyde (3 drums), naphthalene (two drums).
- 7/18/01, TX02612184, to Treatment One, Houston, TX, formaldehyde (400 pounds), phenol solutions (800 pounds), and naphthalene (400 pounds).
- 8/8/01, IL9352993 to Envirite, Harvey, IL, waste liquid, lead, cadmium, (511 gallons).

The Following are Treatment One (SET Environmental) waste stream profiles included in the response:

- TO1: 2 x 55 gallons, "unused product", contains Phenol 15% and Formaldehyde 1%, Phenol-urea-formaldehyde resin 70%. UN2810. "Chem Rez 057853" 5/16/01

- TO2: 1 x 55 gallons, unused material, Phenolic resin, phenol, ester solvents. "Techniset" resin part 1
- TO3 5/16/01, "Forseo Carsil" Sand Binder, 1 x 55 gallon, corrosive, unused product, base, sodium silicate,
- TO4: 7/26/01, 1 x 55 gallons, waste paint, unused material for painting castings, debris, alkyd resin 6-10%, xylene 6-10%, D001
- TO5: 5/30/01, 1 x 55, unused material, waste part 3 "Techniset activator", aromatic 150 solvent containing naphthalene 50%, 4-phenyl propyl pyridine 25%, 1-methyl imidazole 25% "not EPA regulated"
- TO6: undated, unused material, waste "Techniset coreactant part 2", look at this for the constituents, lots of stuff. "Not EPA regulated"
- TO7: 2 x 55 gallons, waste compressor oil, to Beaver oil, one drained non PCB transformer,
- SET1; not regulated core wash solid

ABC-NACO submitted a copy of a proposal by SET Environmental, Inc. of Bridgeview, Illinois, to clean, or "close" the hazardous waste related equipment. The proposal is dated April 13, 2001. This document relates to the "Phase 1 Assessment" mentioned by Mr. Farmer during the March 28 inspection.

A second document, dated April 16, 2001, is included with the RCRA §3007 response. This document included some estimates on the cleanup of the facility.

A third document is a "Certificate of Analysis Report" on the "moist brown filtercake". The origin of the moist brown filter cake is unknown but is likely to be associated with the closure activities.

A fourth document, dated August 15, 2001, is a cover letter to Mr. Jerry Farmer regarding a project summary of SET's onsite activities. The attached summary, one page long, certifies that SET has decontaminated the facility in accordance to the agreement made with ABC-NACO.

Findings

ABC-NACO, Melrose Park facility, cast its last part on November 22, 2000. The facility has shut down since that day. ABC-NACO transported three hazardous waste shipments out of its facility prior to the U.S. EPA inspection and continued to ship out hazardous waste as it was generated during the cleaning of equipment and duct work.

The facility contracted with SET Environmental to conduct the closure activities required by IAC §725.211 and IAC §725.214. It appears that ABC-NACO has fulfilled its duties under Illinois regulations to provide generator closure for its Melrose Park facility.

No violations or concerns were identified either in the inspection or the subsequent closure activities.

bcc: Author's Copy (Robert Smith) (w/encl.)
7Th floor File room copy (w/encl.)
Branch Copy
Section Copy

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY
	10/9/01 PB		
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 SECTION CHIEF	COMPLIANCE SECTION 2 SECTION CHIEF	CA SECTION SECTION CHIEF
ROS 10-3-01	10/4/01		

C.2 Compliance

JOSEPH A. GUIMOND & ASSOCIATES, INC.
Consultants
80 N. Main St., Box 230, Sellersville, Pa. 18960 • (215) 257-5108

July 13, 1981

National Castings Division
Midland-Ross Corporation
20600 Chagrin Boulevard
Cleveland, Ohio 44122

Attention: Michael R. Babbitt, Esq.

Re: Solid Waste Analysis
Melrose Park Works
Our File No. 80-1161

Gentlemen:

Joseph A. Guimond & Associates conducted a Solid Waste Sampling Program at National Castings in Melrose Park, Illinois.

The EP Toxicity test results indicate that the total waste stream produced at the Melrose Park works is well below the federal regulation's (RCRA) maximum concentrations allowable.

The test procedures were done in accordance with EPA guidelines and included the use of the following equipment: Trier, Auger, Scoop, Sterlized Sample Containers, and Sample Labels. The sample was labeled and traced according to EPA regulations. This included the use of a sample seal, field log sheet, and chain of custody sheet for the sample.

The sample was analyzed for the EP Toxicity metals and zinc by Free-Col Laboratories, Meadville, Pennsylvania. Lab analysis techniques were in complete accordance with procedures outlined in the EPA book, Test Methods for Evaluating Solid Waste; Physical/Chemical Methods (SW-846).

If you should have any questions concerning this information, please do not hesitate to call.

Sincerely yours,

JOSEPH A. GUIMOND & ASSOC., INC.

Martha Guimond

Martha Guimond

MG/fvk
Enclosure

SHORT REPORT

JOSEPH A. GUIMOND & ASSOCIATES, INC.
Consultants
80 N. Main St., Box 230, Sellersville, Pa. 18960 • (215) 257-5108

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Sincerely yours,

JOSEPH A. GUIMOND & ASSOC., INC.

Martha Guimond

Martha Guimond

MG/fvk
Enclosure

SHORT REPORT

JOSEPH A. GUIMOND & ASSOCIATES, INC.
SELLERSVILLE, PA. 18960

NATIONAL CASTINGS DIVISION
MIDLAND-ROSS CORPORATION

MELROSE PARK

EP TOXICITY - SUBSTANCE	Composition A		
	Max. Allowable Level	Actual Concentration	In Compliance?
Arsenic	5 mg/l	0.014	Yes
Barium	100 mg/l	0.25	Yes
Cadmium	1 mg/l	0.41	Yes
Chromium	5 mg/l	0.20	Yes
Lead	5 mg/l	<0.10	Yes
Mercury	0.2 mg/l	0.0002	Yes
Selenium	1 mg/l	0.032	Yes
Silver	5 mg/l	0.04	Yes
Zinc	---	9.3	Yes

EP Toxicity per IP 261.24, Table 1

Solid waste samples analyzed by Free-Col Division of Meadville, Pennsylvania.

Composition A:
5% Furnace Dust
10% Furnace Slag
5% Sand System Dust Collector
5% Shotblast Fines
5% Shotblast Dust Collector
70% Waste Sand

JOSEPH A. GUIMOND & ASSOCIATES, INC.
Consultants
80 N. Main St., Box 230, Sellersville, Pa. 18960 • (215) 257-5108

NATIONAL CASTINGS DIVISION
MIDLAND-ROSS CORPORATION

MELROSE PARK

ANALYTICAL REPORT FORM

Parameter	Composite A
Arsenic	0.014 mg/1
Zinc	9.3 mg/1
Barium	0.25 mg/1
Cadmium	0.41 mg/1
Chromium	0.20 mg/1
Mercury	0.0002 mg/1
Selenium	0.032 mg/1
Lead	<0.10 mg/1
Silver	0.04 mg/1

The Leachate was prepared in accordance with the E.P. Toxicity Test Method described in the May 19, 1980 Federal Register.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: December 28, 1981

SUBJECT: Interim Status - Summary and Recommendation on
Midland-Ross Corporation, National Castings Division

FROM: Robert L. Stone RLS
Illinois State Implementation
Officer

TO: Hak K. Cho, Chief HKC
State Technical Unit #1

Summary:

Since 1969, Midland-Ross operated two foundries which generated a solid waste which would have been hazardous by virtue of being EP Toxic if the definition had existed. Historically, the waste had been intermixed with a non-hazardous solid on-site, resulting in a mixture which would not be considered EP Toxic. The mixture had been landfilled in accordance with the Special Waste rules of Illinois EPA.

On August 18, 1980, Midland-Ross notified USPEA, Region V as a generator as required by section 3010(a) of RCRA, and continued mixing the EP Toxic waste and non-hazardous solid waste. The mixing is considered treatment within the meaning of 40 CFR 260.10(a).

On November 19, 1980, Midland-Ross stopped mixing their wastes, and either stored them or shipped them to a landfill. During 1981, Midland-Ross decided to resume mixing their wastes. They were advised to submit a Part A application for each site, which they did July 15, 1981.

On September 29, 1981, additional information was submitted to clarify the applications.

Regulatory considerations:

The memorandum issued by the Office of Waste Programs Enforcement July 31, 1981, elaborated on the various avenues available to qualify for interim status. The particular circumstances of the Midland-Ross operations fit the interpretation of 40 CFR 122.22(a)(1) which is explained on pages 3 and 4 of the memorandum, which stated in part:

Requirement that the Owner or Operator File an Application Under Section 3005

"*** The final statutory condition for achieving interim status is that the owner or operator of a facility have 'filed an application under . . . section [3005].' EPA's regulations implementing Section 3005 condition eligibility for interim status on a facility's having 'complied with the requirements of §122.22(a) . . . governing submissions of Part A applications.' (See, 40 CFR 122.23(a)(2))

"Section 40 CFR 122.22(a) formerly required that all owners and operators of existing hazardous waste treatment, storage, or disposal facilities submit Part A of their permit application by November 19, 1980. The section was amended on November 19, 1980, to redefine the deadline for filing Part A applications. 40 CFR 122.22(a)(1) now provides:

> 'Owners and operators of existing hazardous waste management facilities must submit Part A of their permit application to the Regional Administrator no later than (i) six months after the date of publication of regulations which first require them to comply with the standards set forth in 40 CFR 264 or 265, or (ii) thirty days after the date the date they first become subject to the standards set forth in 40 CFR Parts 264 or 265, whichever first occurs.'

"Accordingly, a facility which handled hazardous waste prior to November 19, 1980, but was not required to apply for a permit because of a regulatory exemption, may qualify for interim status if its owner or operator files a Part A permit application within 30 days after losing its exemp tion. (e.g., a generator who produced hazardous waste prior to November 19, 1980, who after November 19, 1980, accumulates for the first time hazardous waste on-site for longer than 90 days.) As noted in the Federal Register notice pertaining to the amendment, some of the facilities which will qualify for interim status by virtue of 40 CFR 122.22 (a)(1)(ii) technically may be operating without a permit until they submit their permit application. (45 FR 76633, November 19, 1980, attached.) Consequently, these handlers have been given notice that 'EPA will not initiate any enforcement action against them . . . if they notify their EPA Regional Office immediately and file an application within the thirty-day period."

Recommendation:

I recommend we advise Midland-Ross that they have met the requirements for obtaining interim status. The attached letter does NOT contain all the usual caveats, and boiler plate since this is intended to be the final consideration of interim status for the subject facilities.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: December 11, 1981

SUBJECT: Midland-Ross Facilities in Illinois

FROM: Robert L. Stone
State Implementation Officer

TO: David Sims
Office of Regional Counsel

I called OSW today as you requested, and discussed my draft letter to Midland-Ross with Art Glazer (755-9150). I described the history and circumstances of the 2 facilities to him. He directed our attention to the November 19, 1980, Federal Register amendments, particularly the 2 paragraphs (marked in red) on page 76633 we discussed earlier Mr. Glazer is of the opinion that Midland-Ross appears to have met the requirement for interim status. He said this question has been raised in other regions, and interim status conferred.

He recommended the second sentence be revised to "appears to meet the requirements for obtaining interim status." I have made this change already.

D. Corrective Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

March 31, 1994

Mr. Jerry Farmer
Safety Manager
National Castings Incorporated
110 North 25th Avenue
Melrose Park, IL 60160

Re: Visual Site Inspection
National Castings, Incorporated
Melrose Park, Illinois
ILD 072 317 761

Dear Mr. Farmer:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/ Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Cathy M. Collins
Date: March 17, 1994

Background Facility Information

Facility Name: National Castings Incorporated
EPA Identification No.: ILD 072 317 761
Location (City, State): Melrose Park, Illinois
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility consisting of 11 SWMUs

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

( ) No corrective action activities initiated (Go to 5)
(X) RCRA Facility Assessment (RFA) or equivalent completed
( ) RCRA Facility Investigation (RFI) underway
( ) RFI completed
( ) Corrective Measures Study (CMS) completed
( ) Corrective Measures Implementation (CMI) begun or completed
( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

( ) Operating permit
( ) Post-closure permit
( ) Enforcement order
( ) Other (Explain)

Corrective action has not been initiated.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

( ) Yes
( ) No
( ) Uncertain; still underway
(X) Not required

Additional explanatory notes:

Interim measures have not been required. There is no history or suspicion of releases to environmental media at this facility.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

( ) Groundwater
( ) Surface water
( ) Air
( ) Soils

6. Are contaminant releases migrating off-site?

( ) Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:
Surface water:
Air:
Soils:

(X) No
( ) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes (Go to 8a)
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes (Go to 9)
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

( ) Yes
(X) No
( ) Uncertain

Additional explanatory notes:

There is no history or suspicion of releases to environmental media at this facility.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

( ) Solid
( ) Light non-aqueous phase liquids (LNAPLs)
( ) Dense non-aqueous phase liquids (DNAPLs)
( ) Dissolved in groundwater or surface water
( ) Gaseous
(X) Other None

13. Which of the following major chemical groupings are of concern at the facility?

( ) Volatile organic compounds (VOCs) and/or semi-volatiles
( ) Polynuclear aromatics (PAHs)
( ) Pesticides
( ) Polychlorinated biphenyls (PCBs) and/or dioxins
( ) Other organics
(X) Inorganics and metals
( ) Explosives
( ) Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

( ) Yes; Indicate possible course of action.

(X) No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

There is no history or suspicion of releases to environmental media at this facility.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

( ) Yes
( ) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes
( ) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

( ) Yes
( ) No, not feasible
(X) No, not required
( ) Further investigation necessary

Explain final decision, using additional sheets if necessary.

This information was obtained from a 1993 PA/VSI prepared by PRC Environmental Management, Inc.

There is no history or suspicion of releases to environmental media at this facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

July 16, 1993

Mr. Jerry Farmer
National Castings Incorporated
110 North 25th Avenue
Melrose Park, Illinois 60160

Re: Visual Site Inspection
National Castings Incorporated
Melrose Park, Illinois
ILD 072 317 761

Dear Mr. Farmer:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI is scheduled for Wednesday, August 4, 1993, at 9:30 a.m. The inspection team will consist of Sandy Anagnostopoulos and Mary Wojciechowski of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene D. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Gino Bruni - IEPA, Maywood
Larry Eastep - IEPA, Springfield

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

July 16, 1993

Mr. Jerry Farmer
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: MAY 04 1994

SUBJECT: Justification for Withholding Executive Summary and Conclusions and Recommendations Sections of the Preliminary Assessment/Visual Site Inspection

FROM: Kevin M. Pierard, Chief
Technical Enforcement Section #1
RCRA Enforcement Branch

TO: File

The "Executive Summary" and "Conclusions and Recommendations" sections of the Preliminary Assessment/Visual Site Inspection (PA/VSI) are being withheld as enforcement confidential. This decision is based upon the Freedom of Information Act (FOIA) 5 U.S.C. §552. These sections are excluded based on exemptions 5 U.S.C. §552(b)(5), which state that the PA/VSI is a "predecisional, deliberative document" and 5 U.S.C. §552(b)(7)(A), "disclosure could reasonably interfere with enforcement proceedings".

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

NATIONAL CASTINGS INCORPORATED MELROSE PARK, ILLINOIS ILD 072 317 761

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 072 317 761
Date Prepared	:	March 28, 1994
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032IL72
Prepared by	:	PRC Environmental Management, Inc. (Sandy Anagnostopoulos)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

CONTENTS

FIGURES

TABLES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the National Castings Incorporated (NCI) facility in Melrose Park, Cook County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The NCI facility is a steel casting foundry where scrap steel is melted and refined in electric arc furnaces and poured into sand moldings. NCI supplies castings primarily to railroad manufacturing industries. The facility generates and manages hazardous baghouse dust (D006). The facility also generates and manages the following nonhazardous waste streams: used sand, baghouse dust, slag, waste firebrick, water and used oil mixture, trash, and rubbish. NCI has operated as a foundry at its current location since 1909. The facility occupies about 20 acres in an industrial and residential area and employs about 340 people.

Beginning in 1981, NCI was regulated as a generator and a treatment, storage, or disposal (TSD) facility of hazardous waste. On August 29, 1985, EPA withdrew the treatment process listed on NCI's Part A permit application because based on information the facility submitted to EPA, NCI had not mixed hazardous and nonhazardous waste since before November 19, 1980. On August 5, 1986, the NCI facility submitted a closure plan for the Former Hazardous Waste Storage Area (SWMU 2). On March 7, 1988, the Illinois Environmental Protection Agency (IEPA) approved NCI's closure plan and withdrew the facility's Part A permit application. Currently, the facility operates as a large-quantity generator.

The PA/VSI identified the following 11 SWMUs and no AOCs at the facility:

Solid Waste Management Units

1. Electric Arc Furnace Baghouse Dust Accumulation Area
2. Former Hazardous Waste Storage Area
3. Used Sand Accumulation Area
4. Moldings Baghouse Dust Collector

5. Used Sand Storage Piles
6. Slag Accumulation Area
7. Shot Cleaning Accumulation Areas
8. Air Compressor Used Oil Satellite Accumulation Area
9. Current Used Oil Storage Area
10. Former Used Oil Storage Area
11. Former Incinerator

No releases from the NCI facility have been documented. Based on the VSI and review of EPA, IEPA, and facility files, the potential for release from all SWMUs to groundwater, surface water, air, or on-site soils is low because all SWMUs operated with adequate release controls. All but two SWMUs manage nonhazardous waste. The Electric Arc Furnace Baghouse Dust Accumulation Area (SWMU 1) manages hazardous baghouse dust (D006) in a lined and covered 15-cubic-yard roll-off box. The Former Hazardous Waste Storage Area (SWMU 2) also managed hazardous baghouse dust (D006) in the past; however, this unit has been inactive since mid-1981 and was RCRA closed in 1988.

The nearest residence to the NCI facility is located 1 block east. The facility is surrounded by an 8-foot chain-link fence. A security guard is on site 24 hours a day. Groundwater in the area is used as a municipal water supply by the city of Bellwood, Illinois. Bellwood currently has three operating groundwater wells within a 2-mile radius of the NCI facility. The nearest surface water body, Addison Creek, is located about 600 feet west of the facility. The Des Plaines River is located about 1.6 miles east of the facility and is used for recreational purposes. The nearest sensitive environment, Thatcher Woods Forest Preserve, is located adjacent to the Des Plaines River.

PRC recommends that no further action be taken for any of the SWMUs at the NCI facility at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the National Castings Incorporated (NCI) facility (EPA Identification No. ILD 072 317 761) in Melrose Park, Cook County, Illinois. The PA was

completed on August 3, 1993. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), Illinois State Geological Survey (ISGS), U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Geological Survey (USGS), and from EPA Region 5 RCRA files. The VSI was conducted on August 4, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified 11 SWMUs and no AOCs at the facility.

The VSI is summarized and 15 of the 25 inspection photographs taken are included in Appendix A. The photographs have been renumbered; thus, their numbers differ from the photograph numbers in the VSI field notes which are included in Appendix B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

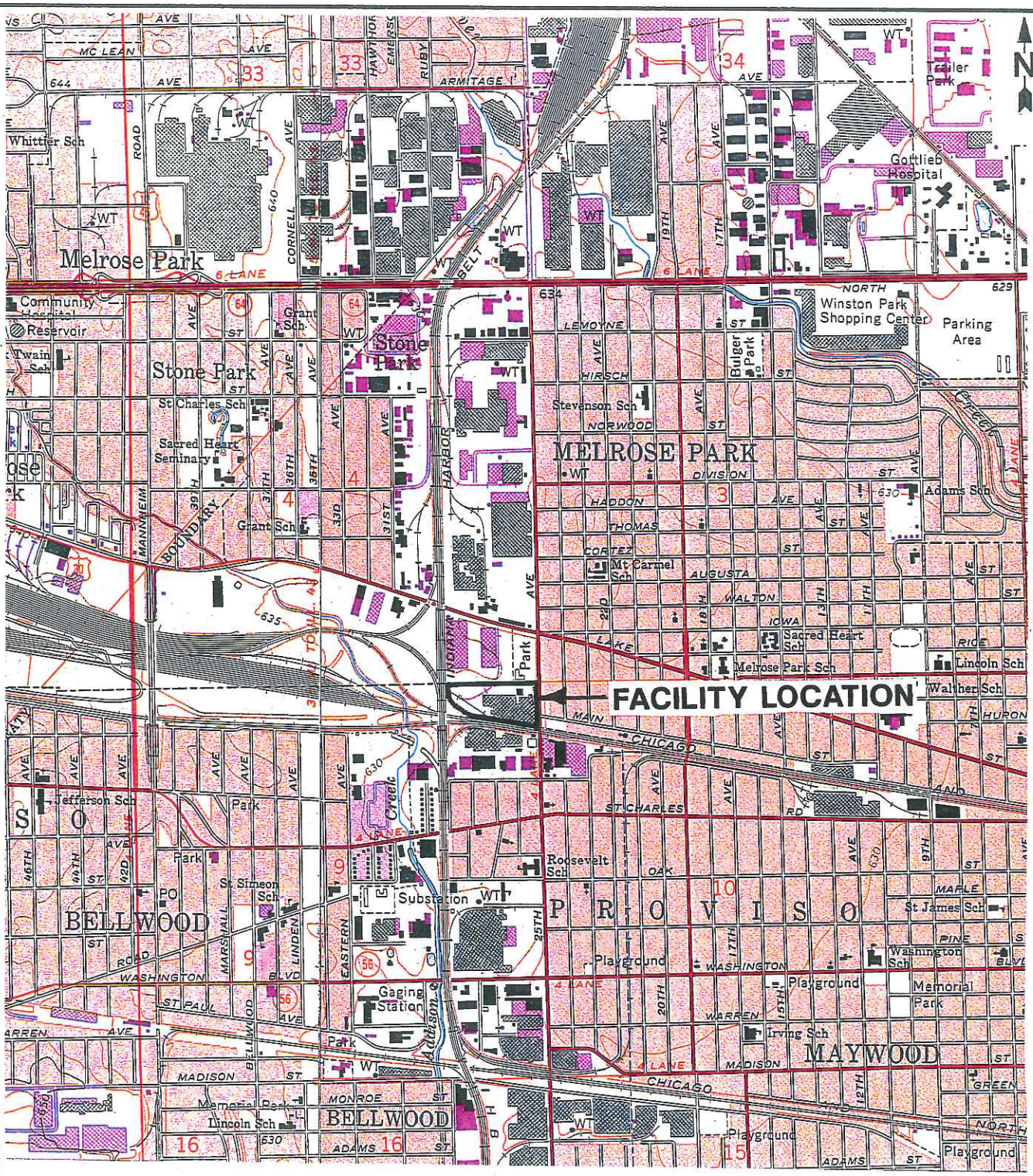
The NCI facility is located at 110 North 25th Avenue in Melrose Park, Cook County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41° 53' 30" N and longitude 87° 52' 00" W) (Midland Ross 1981b). The facility occupies 20 acres in a mixed industrial and residential area.

The facility is bordered on the north by a Jewel Food Stores warehouse, on the east by 25th Avenue and a Public Storage warehouse, on the south by the C&NW Railroad and Handschy Industries, Incorporated, and on the west by an Indiana Harbor Belt Railroad yard (PRC 1993d).

2.2 FACILITY OPERATIONS

The NCI facility is a steel casting foundry where scrap steel is brought in by railroad cars, melted and refined in an electric arc furnace, and poured into sand moldings. NCI supplies castings primarily to railroad manufacturing industries. The NCI facility has approximately 60,000 square feet of building space and occupies about 28 acres in an industrial and residential area. NCI employs about 340 people. Employees work three shifts, 5 days a week. The facility is surrounded by a chain-link fence. A security guard is on site 24 hours a day.

NCI has operated the facility since July 1985. From 1966 to 1985, the facility operated as the National Castings Division of Midland Ross Corporation. From 1909 to 1966, the facility was operated by the National Malleable Castings Company. The company changed its name twice during this period of time. In 1923, the company changed its name from National Malleable Castings Company to National Steel Castings Company and in 1961 it was changed to National Castings



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SCALE: 1" = 2,000'

SOURCE: MODIFIED FROM USGS,
ELMHURST, ILLINOIS, QUADRANGLE, 1980
RIVER FOREST, ILLINOIS, QUADRANGLE, 1978

QUADRANGLE LOCATION

NATIONAL CASTINGS INCORPORATED
MELROSE PARK, ILLINOIS

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

NCI-MELDWG - 09/20/93 - MLB 309-R05032IL72

Company. Since 1909, the facility has operated as a foundry which produces steel castings. No information on land use prior to 1909 was available during the PA/VSI. The facility closed in December 1981 due to a lack of business. The facility reopened in December 1982 and has remained in operation since then.

During normal operations, the NCI facility generates hazardous (D006) and nonhazardous baghouse dust, used sand, slag, waste firebrick, a water and used oil mixture, trash, and rubbish. The baghouse dust from the electric arc furnace area has been regulated as a D006 hazardous waste since 1981. NCI also produces small amounts of used oil which is transported off site.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the NCI facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

The NCI facility produces steel castings by melting scrap steel and pouring it into sand moldings. The scrap steel is melted in an electric arc furnace on site. Alloys are added to the scrap metal used to make castings. The process of melting the scrap steel results in a fine dust. The dust is collected by a baghouse located in the electric arc furnace area. The dust contains enough cadmium to be considered a D006 hazardous waste by EPA. The dust is collected at the Electric Arc Furnace Baghouse Dust Accumulation Area (SWMU 1). The dust is collected in a bag attached to the bottom of the baghouse. The bag is contained in an aluminum shed. When the bag is filled it is emptied into a plastic-lined, 15-cubic-yard roll-off box located adjacent to the aluminum shed. The roll-off box is covered securely with a tarpaulin. The facility generates about 250 cubic yards of D006 baghouse dust each year.

From March 1989 to August 1991 and since November 1992, Peoria Disposal Company (ILD 000 805 812) of Peoria, Illinois, has been contracted to remove the dust from the roll-off box when the roll-off box has filled (PRC 1993a). Peoria Disposal Company removes the dust from the roll-off box about once each month. From August 1991 to November 1992, the baghouse dust (D006) was

TABLE 1

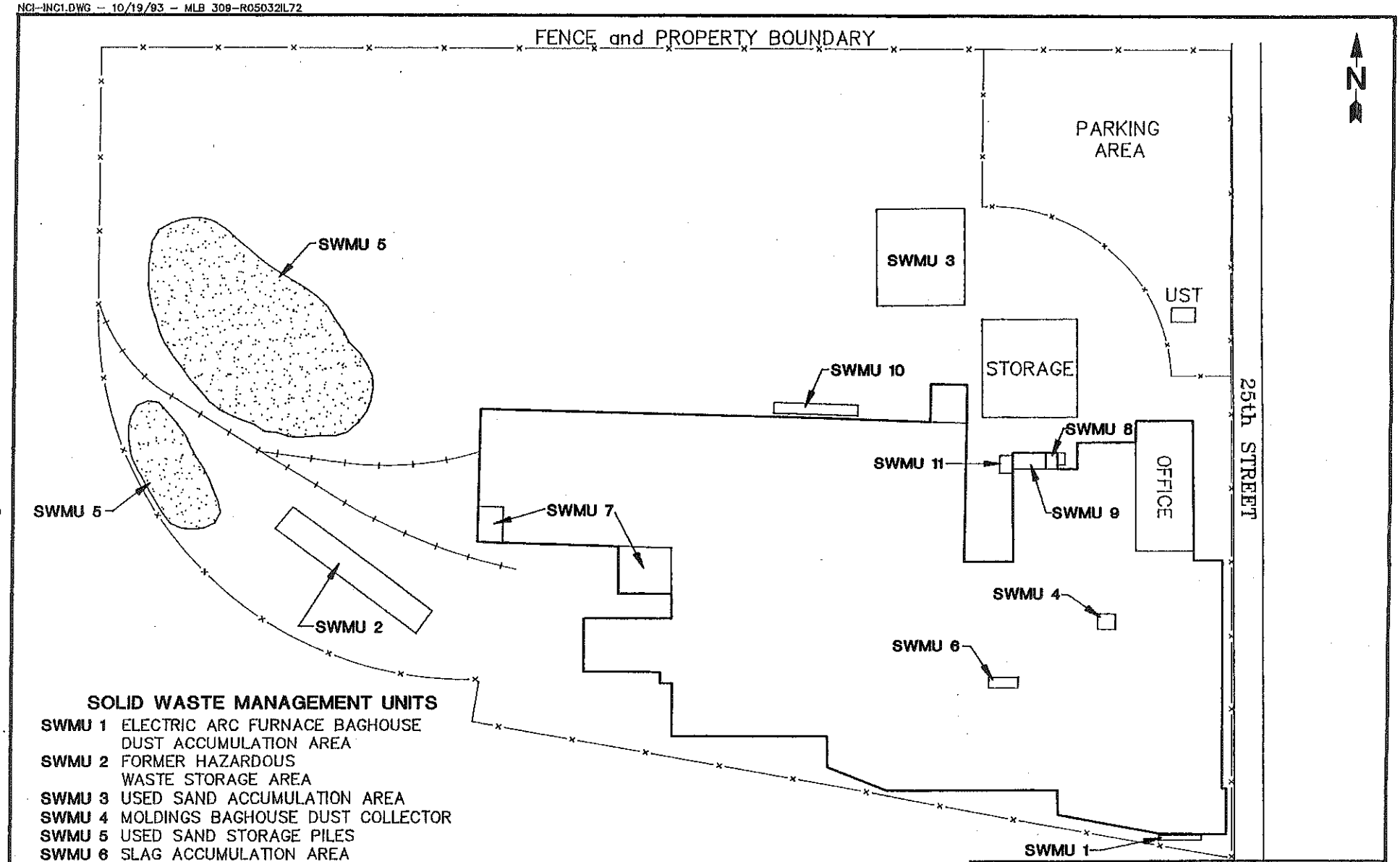
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Electric Arc Furnace Baghouse Dust Accumulation Area	No	Active; accumulation of D006 waste for less than 90 days storage
2	Former Hazardous Waste Storage Area	Yes	RCRA closed; closure approved by IEPA on March 7, 1988
3	Used Sand Accumulation Area	No	Active; accumulation of nonhazardous waste
4	Moldings Baghouse Dust Collector	No	Active; accumulation of nonhazardous waste
5	Used Sand Storage Piles	No	Active; storage of nonhazardous waste
6	Slag Accumulation Area	No	Active; accumulation of nonhazardous waste
7	Shot Cleaning Accumulation Areas	No	Active; accumulation of nonhazardous waste
8	Air Compressor Used Oil Satellite Accumulation Area	No	Active; accumulation of nonhazardous waste
9	Current Used Oil Storage Area	No	Active; storage of nonhazardous waste
10	Former Used Oil Storage Area	No	Inactive since 1992
11	Former Incinerator	No	Inactive since before 1980

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

NCI-INCI.DWG – 10/19/93 – MLB 309-R05032IL72



SOLID WASTE MANAGEMENT UNITS

SWMU 1 ELECTRIC ARC FURNACE BAGHOUSE DUST ACCUMULATION AREA
SWMU 2 FORMER HAZARDOUS WASTE STORAGE AREA
SWMU 3 USED SAND ACCUMULATION AREA
SWMU 4 MOLDINGS BAGHOUSE DUST COLLECTOR
SWMU 5 USED SAND STORAGE PILES
SWMU 6 SLAG ACCUMULATION AREA
SWMU 7 SHOT CLEANING ACCUMULATION AREAS
SWMU 8 AIR COMPRESSOR USED OIL SATELLITE ACCUMULATION AREA
SWMU 9 CURRENT USED OIL STORAGE AREA
SWMU 10 FORMER USED OIL STORAGE AREA
SWMU 11 FORMER INCINERATOR

UST = UNDERGROUND STORAGE TANK

75' 0 75' 150'
APPROXIMATE SCALE: 1" = 150'

SOURCE: MODIFIED FROM MIDLAND ROSS 1981b

NATIONAL CASTINGS INCORPORATED
MELROSE PARK, ILLINOIS

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a]	Source	Solid Waste Management Unit
Baghouse dust/D006	Dust collection from electric arc furnace area	1 and 2
Used sand/NA	Moldings for steel castings	3, 5, and 7
Baghouse dust/NA	Dust collection from molding production and shot cleaning areas	3, 4, and 7
Slag/NA	Production of steel castings	6 and 7
Waste firebrick/NA	Steel ladle and arc furnace maintenance	6
Water and used oil mixture/NA	Air compressor and motor vehicle machine maintenance	8, 9, and 10
Trash and rubbish/NA	General facility activities	11

Notes:

[a] Not applicable (NA) designates nonhazardous waste.

transported by American Waste Hauler (ILD 000 675 231) of Maywood, Illinois, to CID Landfill (ILD 010 284 248) in Calumet City, Illinois (PRC 1993a). From December 1981 to March 1989, the dust was removed by Browning Ferris Industries, Inc. (BFI), and went to Winthrop Harbor/BFI (ILD 180 011 843) in Zion, Illinois, for landfilling (PRC 1993a).

From late 1966 to November 1980, the facility mixed this baghouse dust with nonhazardous waste for disposal (Midland Ross 1981b). Beginning in November 1980, EPA informed the NCI facility that it could no longer mix D006 waste with nonhazardous waste resulting in a nonhazardous waste. The facility began storing D006 baghouse dust while searching for an appropriate disposal site. The D006 hazardous waste was stored in the Former Hazardous Waste Storage Area (SWMU 2) from November 1980 to mid-1981. SWMU 2 is located outdoors on the ground. The dust was stored in closed 55-gallon, steel drums. Drums were banded together in groups of four, were covered with plastic, and were placed on wooden pallets (NCI 1985). About 300 drums were stored at SWMU 2 (NCI 1985). After the 300 drums were removed from SWMU 2 in 1981, SWMU 2 no longer stored hazardous wastes. The facility closed for 1 year following drum removal from SWMU 2. When the facility reopened, hazardous D006 baghouse dust was managed at SWMU 1. RCRA closure for SWMU 2 was approved by IEPA on March 7, 1988 (IEPA 1988). Currently, three piles of railroad ties are stacked in the area of SWMU 2.

Moldings are used to form NCI's steel castings. The moldings are made of a mixture of sand and a small amount of bentonite. After a casting of the molding is made, a portion of the sand can be reused to make additional moldings without further treatment. Additional moldings are formed by mixing the used sand with new sand. Excess used sand which cannot be reused is stored at the Used Sand Storage Area (SWMU 3). SWMU 3 consists of three or four 20-cubic-yard roll-off boxes located outdoors on concrete. The NCI facility generates about 1,200 cubic yards of nonhazardous used sand monthly. BFI of Melrose Park, Illinois, has been contracted to remove the contents of SWMU 3. BFI removes used sand from the facility 5 days a week and transports it to Mallard Lake Landfill in Hanover Park, Illinois for landfilling (PRC 1993a).

The NCI facility has a second baghouse located in the moldings production area. Baghouse dust from this baghouse has never been considered a hazardous waste by EPA. Dust from the moldings production area is collected in plastic bags attached to the bottom of the baghouse at the Moldings

Baghouse Dust Collector (SWMU 4). The plastic bag is contained in a 1-cubic-yard hopper. When the bag is full, it is replaced, and the full bag is removed to SWMU 3 where it is disposed of by BFI along with excess used sand. The NCI facility generates about 20 cubic yards monthly of nonhazardous baghouse dust from the baghouse in the moldings area.

From 1991 to 1992, the NCI facility began accumulating used sand for economic reasons and in anticipation of the installation of a sand reclaiming unit. The facility accumulated the used sand at the Used Sand Storage Piles (SWMU 5) on site. SWMU 5 consists of two sand piles. One pile measures about 150- by 60- by 25-feet and is made of finer grained reusable sand which can be reused when the facility installs a sand reclaiming unit. The second pile measures about 300- by 150- by 35-feet and contains sand which cannot be reused by the facility. On April 30, 1992, IEPA collected samples from both sand piles. Analysis of these samples detected low levels of barium and chromium (IEPA 1992). IEPA requested no further action from the facility regarding the sand piles. The facility has begun disposal of the sand from the larger pile in small loads. During 1993, BFI disposed of about 75 15-cubic-yard loads of sand. The facility plans to continue disposal until the larger pile has been removed. Installation of a sand reclaiming unit is anticipated by the facility sometime in 1994 or 1995.

After a molding is made, a casting is produced by pouring molten metal into the molding. The metal is melted in an electric arc furnace and is poured into 20-ton capacity steel ladles lined with firebrick. Impurities in the metal float to the surface of the molten metal. Facility employees calculate the amount of impurities in the metal and pour off this portion into a concrete pit filled with water. The water in the pit evaporates and the impurities in the molten metal crystalize to form nonhazardous slag. The slag is removed from the pit and is placed in a 15-cubic-yard roll-off box, the Slag Accumulation Area (SWMU 6). SWMU 6 is located adjacent to the cooling pit. When the roll-off box is filled, the contents are disposed of by BFI. The NCI facility generates about 15 cubic yards of slag monthly.

A portion of the castings produced by NCI needs to be heat treated in one of nine gas furnaces on site. After being placed in the gas furnaces, the castings are water cooled. The facility has two on-site quench tanks used for this process. The tanks are made of steel and are located indoors. Each tank is about 15- by 20-feet and 15-feet deep. The quench tanks are part of a closed loop system.

Effluent from the tanks is not discharged. Effluent in the tank is pumped temporarily to a holding tank when slag accumulated in the bottom of each tank is removed. The slag generated by this process is disposed of at SWMU 6 along with slag generated from other facility processes.

The facility has six ladles used to pour molten metal into moldings. One of these ladles is rebricked with new firebrick about once every one or two months. In addition, the electric arc furnace used to melt the steel is also rebricked about once every year. These processes generate about 20 cubic yards of waste firebrick each year. The waste firebrick is disposed of in the roll-off box of SWMU 6 with slag.

After a casting has been produced, bits of slag and sand cling to the casting. To remove the slag and sand, the facility uses two shot cleaning machines. These machines bombard each casting with small steel pellets. Each machine has an associated baghouse. The process of cleaning the castings generates nonhazardous sand, slag, and baghouse dust which is collected at the Shot Cleaning Accumulation Areas (SWMU 7).

SWMU 7 consists of two 1-cubic-yard roll-off boxes, plastic bags attached to the bottom of two baghouses, and a 15-yard roll-off box. The sand and slag generated by the shot cleaning process are collected in a 1-cubic-yard hopper. The fine nonhazardous dust generated by the shot cleaning process is collected by a baghouse. The hopper which collects the sand and slag from each shot cleaning machine is located indoors on a concrete floor. The baghouse associated with each shot cleaning machine is located outdoors near the shot cleaning machine. Dust from each baghouse is collected in a plastic bag attached to the bottom of the baghouse. The plastic bag from one shot cleaning machine is contained in an aluminum shed. The baghouse dust from the second shot cleaning machine is discharged into a plastic bag contained in a 1-cubic-yard hopper located indoors. When the bags are full they are replaced and disposed of in a 15-cubic-yard roll-off box located outdoors adjacent to the aluminum shed housing the plastic bag of on of the baghouses. The sand and slag generated by the shot cleaning process and collected in 1-cubic-yard hoppers is also disposed of in the roll-off box. The contents of the roll-off box is disposed of by BFI. Each year, the facility generates about 130 cubic yards of baghouse dust, sand, and slag from the shot cleaning machines (PRC 1993a).

The NCI facility has an air compressor on site to power various equipment. Since 1990, there has been an oil leak in one of the compressor lines. The facility has not been able to determine where this leak originates. Therefore, beginning in 1990 the facility has been collecting a mixture of oil and water generated by the air compressor at the Air Compressor Used Oil Satellite Accumulation Area (SWMU 8). SWMU 8 consists of a closed, 55-gallon, steel drum located in an aluminum shed. Each month, the NCI facility generates about 300 gallons of this water and used oil mixture.

When the drum of SWMU 8 is filled, it is replaced and moved to the Current Used Oil Storage Area (SWMU 9). SWMU 9 is located indoors in a room where the floor is sunken to a level about 4 inches below the outside grade. Since 1992, the facility has been using SWMU 9 to store nonhazardous used oil generated from the air compressor and the small amount of nonhazardous used oil generated by motor vehicle maintenance. The facility has contracted SET Environmental Company (SET Environmental) (ILD 981 957 236) in Wheeling, Illinois, to remove the contents of drums at SWMU 9 as needed for recycling.

From 1990 to 1992, the facility stored its used oil from the air compressor and vehicle maintenance at the Former Used Oil Storage Area (SWMU 10). SWMU 10 was located outdoors on the ground and stored about 60 55-gallon, steel drums. In 1992, the facility had SET Environmental remove the drums for recycling. According to facility representatives, there were areas of stained soil in the area of SWMU 10. On April 30, 1992, IEPA collected a sample of the stained soil. Analysis of this sample detected low levels of several volatile organic compounds and barium (IEPA 1992). IEPA requested no further action from the facility regarding the stained soil. BFI removed and disposed of about 25 cubic yards of visibly stained and unstained soils in 1992 (PRC 1993d). Currently, the area of SWMU 10 is covered with clean gravel.

According to facility representatives, for an unknown period of time before 1980, the facility used the Former Incinerator (SWMU 11) to dispose of trash and rubbish generated at the facility. This unit was removed in 1991 or 1992. This unit was located outdoors.

2.4 HISTORY OF DOCUMENTED RELEASES

The NCI facility has no history of documented releases of hazardous wastes or hazardous constituents to groundwater, and surface water, air. A release to on-site soils from SWMU 10 has occurred. Analysis of this sample detected low levels of several volatile organic compounds and barium (IEPA 1992). IEPA requested no further action from the facility regarding the stained soil. BFI removed and disposed of about 25 cubic yards of visibly stained and unstained soils in 1992 (PRC 1993d).

2.5 REGULATORY HISTORY

The NCI facility submitted a Notification of Hazardous Waste Activity to EPA on November 17, 1980 (Midland Ross 1980). NCI submitted a second Notification of Hazardous Waste Activity to EPA on July 7, 1981 (Midland Ross 1981a). NCI submitted a RCRA Part A permit application on July 10, 1981 with a process code of T04 (treatment other than tank, surface impoundment, or incinerator) for 260 tons of D006 (cadmium) wastes annually (Midland Ross 1981b). The treatment process referred to in the facility's Part A permit application was the facility's mixing of D006 waste with nonhazardous waste resulting in a nonhazardous composite waste. This process was conducted while loading wastes into railroad cars (Midland Ross 1981b). NCI submitted a second RCRA Part A permit application on an unknown date in 1984 with process codes S01 (container storage) and T04 for 260 tons of D006 wastes annually (Midland Ross 1984a). Currently, the facility operates as a large-quantity generator.

Beginning in 1981, NCI was regulated as a generator and a treatment, storage, or disposal (TSD) facility of hazardous waste (Midland Ross 1981a). On August 29, 1985, EPA withdrew the treatment process listed on NCI's Part A permit application because based on information the facility submitted by the facility to EPA, NCI had not mixed hazardous and nonhazardous waste since before November 19, 1980 (EPA 1985). On August 5, 1986, the NCI facility submitted a closure plan for the Former Hazardous Waste Storage Area (SWMU 2) (IEPA 1988). On March 7, 1988, IEPA approved NCI's closure plan and withdrew the facility's Part A permit application (IEPA 1988).

The NCI facility has an operating permit (IEPA Application No. 73010299). The permit includes emission sources and air pollution control equipment for the facility's furnaces and baghouses. The expiration date of the permit is August 19, 1995 (IEPA 1990). Documentation of permit violations were not found in IEPA files.

On September 6, 1985, IEPA conducted a RCRA inspection of the NCI facility (IEPA 1985). Violations discovered during these inspections primarily involved paperwork.

One underground storage tank (UST) is located on site at the NCI facility. According to facility representatives, the UST is constructed of steel and has a capacity of 1,000 gallons. The UST was used to store gasoline from about 1975 to 1987. The Bellwood Fire Department performed a pressure test on the UST in 1987 and determined that the tank was not leaking. According to facility representatives, the UST was emptied and has not been used since the late 1980s. The pump to the tank has been disconnected (PRC 1993a).

Evidence of CERCLA activities conducted on site was not found.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

2.6.1 Climate

The climate in Cook County is greatly influenced by Lake Michigan. The average daily high temperature in July is 72.2 °F and the average daily low temperature in January is 21.1 °F. The average annual temperature is 49.0 °F (USDA 1979).

The yearly mean precipitation for the county is 33.4 inches. Average snowfall is 38.3 inches, occurring between October and May (USDA 1979). Annual mean lake evaporation in the vicinity of Cook County is approximately 29.7 inches (USDC 1968). The 1-year, maximum 24-hour rainfall in the area is approximately 2.4 inches (USDC 1961). Winds are typically from the north-northeast in

winter and from the south in summer. Average wind speeds range from 8.1 to 12.1 miles per hour (USDC 1980).

2.6.2 Flood Plain and Surface Water

The area of the NCI facility is located outside the 500-year flood plain (FEMA 1981). The nearest surface water body, Addison Creek, is located 600 feet west of the facility. The Des Plaines River is located 1.6 miles east of the facility and is used for recreational purposes. Lake Michigan is located about 12 miles east of the facility. Lake Michigan is used as a source of municipal water and for recreational purposes. Surface water from the facility is discharged via storm sewers to the Metropolitan Water Reclamation District publicly-owned treatment works.

2.6.3 Geology and Soils

Surface soils in the area are classified as uniform, relatively impermeable silty or clayey till at least 20 feet thick. The soils have no evidence of interbedded sand and gravel (Berg and others 1984).

Regional geology for the area is classified by ISGS. Surface soils are underlain by about 320 feet of Silurian Age dolomites. Beneath the dolomites are four members of Ordovician Age: Maquoketa shale-dolomite, Galena-Platteville dolomite, St. Peter sandstone, and Oneota dolomite. The St. Peter sandstone is the only significant water bearing unit of Ordovician Age, and is about 900 feet below ground surface (bgs) in the region. Below the Ordovician system is the Cambrian system. It consists of the following three units: Trempealeau dolomite, Franconia sandstone and dolomite, and Ironton-Galesville sandstone. Of the Cambrian units, only the Ironton-Galesville sandstone produces significant quantities of water (ISGS 1943).

2.6.4 Groundwater

The city of Bellwood, located adjacent to the facility, draws 50 percent of its drinking water from three wells located between about 1 and 1.5 miles from the NCI facility. These wells are screened at depths between 1,490 and 1,900 feet below ground surface (PRC 1993b).

A shallow bedrock zone in northeastern Illinois underlies the glacial sediments and is mainly composed of Silurian dolomite. The upper boundary of this zone is the erosional surface of the bedrock, which is commonly obscured by glacial sediments, and the lower boundary is the upper Ordovician Maquoketa shale. Water produced from the dolomite is obtained from fractures and solution openings. The shallow bedrock aquifer zone receives some recharge locally from precipitation (Hughes and others 1966).

2.7 RECEPTORS

The facility occupies about 28 acres in an industrial and residential area of Melrose Park, Cook County, Illinois. Melrose Park has a population of about 20,860 (Rand McNally 1992).

The facility is bordered on the north by a Jewel Food Stores warehouse, on the east by 25th Avenue and a Public Storage warehouse, on the south by the C&NW Railroad and Handschy Industries, Incorporated, and on the west by an Indiana Harbor Belt Railroad yard (PRC 1993d). The facility is surrounded by an 8-foot, chain-link fence and a security guard is on duty 24 hours a day.

The nearest residential area is located one block east of the facility. The nearest surface water body, Addison Creek, is located about 600 feet west of the facility. The Des Plaines River, is located about 1.6 miles east of the facility and is used for recreational purposes. The nearest sensitive environment, Thatcher Woods Forest Preserve, is located adjacent to the Des Plaines River (USGS 1980).

Groundwater is not used as a municipal water supply by Melrose Park. Drinking water for Melrose Park is drawn from Lake Michigan located about 12 miles east of the facility (PRC 1993c). Groundwater is used as a municipal water supply by the city of Bellwood located adjacent to the facility. Fifty percent of Bellwood's drinking water is drawn from three wells located between about 1 and 1.5 miles from the facility. The remaining 50 percent of Bellwood's water is Lake Michigan water purchased from Melrose Park (PRC 1993b).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 11 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1	**Electric Arc Furnace Baghouse Dust Accumulation Area**
Unit Description:	This unit is located outdoors, on concrete. It consists of a baghouse dust collector and a 15-cubic-yard roll-off box. The roll-off box is lined with plastic and is covered with a tarpaulin.
Date of Startup:	This unit began operation in 1982.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages hazardous baghouse dust (D006) from the facility's electric arc furnace dust collectors. The facility generates about 250 cubic yards of D006 baghouse dust each year. Peoria Disposal Company removes the dust from the roll-off box about once each month.
Release Controls:	This unit is located outdoors on concrete. The hazardous baghouse dust is initially collected in a bag directly connected to the baghouse dust discharge point. The bag is contained in an aluminum shed. When the bag is full, it is emptied into a roll-off box that is lined with plastic and has a tarpaulin fastened securely over the top of it.
History of Documented Releases:	No releases from this unit have been documented. This unit is listed on the facility's operating permit (IEPA Application No. 73010299). Documentation of permit violations were not found in IEPA files.

Observations:	This unit was active at the time of the VSI. Both the dust collector bag and roll-off box were partially filled with baghouse dust. The concrete floor of this unit was not cracked. PRC noted no evidence of release (see Photographs No. 1, 2, and 3).
SWMU 2	**Former Hazardous Waste Storage Area**
Unit Description:	This unit was located outdoors on native soil. It measures about 20-by 125-feet and stored about 300 steel, 55-gallon drums. The drums contained hazardous D006 baghouse dust (Midland Ross 1984b). This unit was listed on the facility's 1984 Part A permit application as container storage (S01) of hazardous waste. Railroad ties are currently stacked in the area of this unit.
Date of Startup:	This unit began operation in November 1980 (NCI 1985).
Date of Closure:	This unit became inactive after mid-1981. IEPA approved RCRA closure of this unit on March 7, 1988 (IEPA 1988).
Wastes Managed:	This unit managed baghouse dust (D006) from the facility's electric arc furnace baghouse. Baghouse dust (D006) was stored at this unit from November 1980 to mid-1981.
Release Controls	This unit is located outdoors. Baghouse dust (D006) was collected in steel, 55-gallon drums. Drums were banded together in groups of four, covered with plastic, and placed on wooden pallets (NCI 1985).
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was inactive at the time of the VSI. Gravel was spread over the location of this unit. Three piles of railroad ties were stacked in

	the area of this unit. PRC noted no evidence of release (see Photographs No. 4).
SWMU 3	**Used Sand Accumulation Area**
Unit Description:	This unit is located outdoors on concrete. It consists of three or four 15-cubic-yard roll-off boxes.
Date of Startup:	This unit began operation at some unknown time before 1975.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous used sand from moldings and nonhazardous baghouse dust from SWMU 4. The facility generates about 1,200 cubic yards of used sand each month. BFI disposes of the sand each weekday. BFI analyzes the used sand once every 3 years. The last analysis was conducted in January 1993 (PRC 1994).
Release Controls:	In the spring of 1993, the facility installed concrete pad in the area of this unit. Prior to this time this unit was located on gravel. The roll-off boxes of this unit are not covered but the used sand is disposed of by BFI each weekday.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was active at the time of the VSI. One roll-off box was partially filled with used sand. Two additional empty roll-off boxes were also in the area. A small amount of sand was spilled on the concrete near the partially filled roll-off box (see Photograph No. 5).

SWMU 4	**Moldings Baghouse Dust Collector**
Unit Description:	This unit is located indoors on a concrete floor in an area about 10- by 10-feet. The dust collector is made up of a plastic bag attached to the bottom of a baghouse located in the moldings area. The plastic bag is contained in a 1-cubic-yard hopper. When the plastic bag is full, it is removed to SWMU 3 for disposal by BFI.
Date of Startup:	This unit began operation in the early 1970s.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous baghouse dust from the moldings production area of the NCI facility. This unit generates about 20 cubic yards of baghouse dust monthly.
Release Controls:	This unit is located indoors on a concrete floor. The baghouse dust is collected in a plastic bag directly connected to the baghouse dust discharge point. The plastic bag is contained within a 1-cubic yard hopper.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was active at the time of the VSI. The plastic bag at the bottom of the baghouse was almost full. Some sand was on the floor in the area near this unit (see Photograph No. 6).
SWMU 5	**Used Sand Storage Piles**
Unit Description:	This unit is located outdoors on native soil. It consists of two piles of used sand. One pile measures about 150- by 60- by 25-feet and is

made up of finer grained reusable sand. The second pile measures about 300- by 150- by 35-feet and cannot be reused by the facility.

Date of Startup: This unit began operation in 1991.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous used sand from the facility's moldings. The facility began accumulating the used sand in 1991 and continued accumulation for about 1 year. Currently, the sand from the larger pile is being disposed of in small loads by BFI. During 1993, BFI disposed of about 75 15-cubic-yard loads of sand. The facility plans to continue removal until the larger pile has been completely removed. The facility anticipated the installation of a sand reclaiming unit in 1994 or 1995. Upon installation, the smaller pile of sand will be reclaimed for use by the facility.

Release Controls: No release controls for this unit were apparent, but portions of the sand piles are vegetated. According to facility representatives even on windy days this unit does not pose a dust problem.

History of Documented Releases: No releases from this unit have been documented.

Observations: This unit was active at the time of the VSI. Vegetation was apparent on portions of both piles (see Photographs No. 7 and 8). A road created by trucks was evident on the larger of the two piles. Some miscellaneous debris and nine 55-gallon, steel drums placed on wooden pallets were noted along this road. Six of the drums contained debris for disposal such as used sand. Three of the drums contained reusable scrap metal (see Photograph No. 9). According to

facility representatives this area has been used for miscellaneous debris and some scrap metal since the spring of 1993.

SWMU 6	**Slag Accumulation Area**
Unit Description:	This unit consists of a 15-cubic-yard roll-off box located indoors on a concrete floor. Slag is removed from the slag cooling pit adjacent to this unit and is accumulated in the roll-off box. When the roll-off box is filled, the contents are disposed of by BFI.
Date of Startup:	This unit began operation on an unknown date before 1975.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous slag and waste firebrick. The NCI facility generates about 15 cubic yards of slag monthly.
Release Controls:	This unit is located indoors on a concrete floor and slag is accumulated in a steel roll-off box.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was in operation at the time of the VSI. The roll-off box was partially filled with slag. PRC noted some slag on the floor near this unit (see Photograph No. 10).
SWMU 7	**Shot Cleaning Accumulation Areas**
Unit Description:	This unit collects wastes generated by two shot cleaning machines. This unit consists of two 1-cubic-yard roll-off boxes, plastic bags attached to the bottom of two baghouses, and a 15-yard roll-off box.

Newly molded steel castings are placed in the shot cleaning machines to remove any sand and slag which remains on the casting. The sand and slag are removed by bombarding the casting with steel pellets. This process generates sand and slag which are collected in a 1-cubic-yard hopper and a fine nonhazardous dust which is collected by a baghouse. The hopper which collects the sand and slag is located indoors on a concrete floor. The baghouse associated with each shot cleaning machine is located outdoors near the shot cleaning machine. Dust from each baghouse is collected in a plastic bag attached to the bottom of the baghouse. The plastic bag from one shot cleaning machine is contained in an aluminum shed. The baghouse dust from the second shot cleaning machine is discharged into a plastic bag contained in a 1-cubic-yard hopper located indoors. When the bags are full they are replaced and disposed of in a 15-cubic-yard roll-off box located outdoors adjacent to the aluminum shed housing the plastic bag of on of the baghouses. The sand and slag generated by the shot cleaning process and collected in 1-cubic-yard hoppers is also disposed of in the roll-off box.

Date of Startup: This unit began operation on an unknown date before 1975.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous used sand, slag, and baghouse dust. This unit generates about 130-cubic yards of nonhazardous waste each year.

Release Controls: The nonhazardous baghouse dust is initially collected in plastic bags directly connected to the baghouse dust discharge points. The plastic bag from one of the baghouses of this unit is contained in a 1-cubic-yard hopper located indoors on concrete. The plastic bag of the second baghouse of this unit is contained in an aluminum shed

	located outdoors. The 1-cubic-yard hoppers of this unit which collect sand and slag are located indoors on concrete. The 15-cubic-yard roll-off box of this unit is located outdoors on a bed of gravel. The 15-cubic-yard roll-off box is not covered but the nonhazardous baghouse dust disposed of in it is in plastic bags.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was active at the time of the VSI. The 1-cubic-yard hopper of this unit was partially filled with used sand and slag. The plastic bag at the bottom of the baghouse was partially filled. The 15-cubic-yard roll-off box was empty. PRC noted no evidence of release (see Photograph No. 11).
SWMU 8	**Air Compressor Used Oil Satellite Accumulation Area**
Unit Description:	This unit is located on a concrete floor in an aluminum shed measuring about 12- by 20-feet. This unit is a 55-gallon, steel drum which accumulates a nonhazardous water and used oil mixture from the facility's air compressor.
Date of Startup:	This unit began operation in 1990.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages a nonhazardous water and used oil mixture from the facility's air compressor. The NCI facility generates about 300 gallons of this water and used oil mixture each month. When the drum is full it is replaced and moved to SWMU 9 to be emptied by SET Environmental.

Release Controls:	This unit is located in an aluminum shed on a concrete floor. A 5-inch wide and 3-inch high asphalt berm is located across the door to the shed.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was active at the time of the VSI. PRC noted some staining and water on the floor of this unit (see Photograph No. 12).
SWMU 9	**Current Used Oil Storage Area**
Unit Description:	This unit is located indoors on a concrete floor. The room housing this unit is about 10- by 30-feet and has three brick walls and one wooden wall. The floor is sunken to a level about 4 inches below the outside grade. No floor drains are located in this room.
Date of Startup:	This unit began operation in 1992.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages a nonhazardous water and used oil mixture from the facility's air compressor and the small amount of oil generated from motor vehicle maintenance. SET Environmental has been contracted to pump the oil from the drums on an as needed basis. The NCI facility generated 300 gallons of used oil in 1992.
Release Controls:	This unit is located indoors in a room where the concrete floor is sunken to a level about 4 inches below the outside grade.
History of Documented Releases:	No releases from this unit have been documented.

Observations:	This unit was inactive at the time of the VSI. There were 10 empty 55-gallon, steel drums in this unit. PRC noted no evidence of release (see Photograph No. 13).
SWMU 10	**Former Used Oil Storage Area**
Unit Description:	This unit is located outdoors on native soil. It measures about 15- by 35-feet and stored about 60 steel drums.
Date of Startup:	This unit began operation in 1990.
Date of Closure:	This unit ceased operation in 1992.
Wastes Managed:	This unit managed about 300 gallons of used nonhazardous oil from the facility's air compressor and the small amount of used nonhazardous oil generated from motor vehicle maintenance. When this unit ceased operation in 1992, SET Environmental Company of Wheeling, Illinois, removed the used oil for recycling. Following sampling conducted by IEPA, BFI removed stained soils in the area of this unit for landfilling.
Release Controls:	This unit was located outdoors and had no apparent release controls. According to facility representatives, the steel drums of this unit were kept closed.
History of Documented Releases:	A release from this unit has occurred, staining soil in the area. IEPA collected a sample of the stained soil. Analysis of this sample detected low levels of several volatile organic compounds and barium (IEPA 1992). IEPA requested no further action from the facility regarding the stained soil. BFI removed and disposed of about 25

	cubic yards of visibly stained and unstained soils in 1992 (PRC 1993d).
Observations:	This unit was inactive at the time of the VSI. Gravel was spread over the location of this unit. PRC noted no evidence of release (see Photograph No. 14).
SWMU 11	**Former Incinerator**
Unit Description:	This unit was located outdoors. This unit was used to incinerate nonhazardous waste generated by general facility operations.
Date of Startup:	This unit began operation at some unknown date before 1980.
Date of Closure:	According to facility representatives, this unit ceased operations at some unknown date before 1980. This unit was removed in 1991 or 1992.
Wastes Managed:	According to facility representatives, this unit was used to incinerate nonhazardous trash and rubbish generated by the facility.
Release Controls:	This unit was located on concrete. Information on other release controls for this unit was not found during the PA/VSI.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was inactive at the time of the VSI. The area of this unit is currently covered with concrete. PRC noted no evidence of release (see Photograph No. 15).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 11 SWMUs and no AOCs at the NCI facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 **Electric Arc Furnace Baghouse Dust Accumulation Area**

Conclusions: This unit manages hazardous baghouse dust (D006) in a lined and covered 15-cubic-yard roll-off box. No releases from this unit have been documented. Because this unit is located on concrete, lined with plastic, and covered with a tarpaulin, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 2 **Former Hazardous Waste Storage Area**

Conclusions: This unit managed hazardous baghouse dust (D006) in 55-gallon drums. No releases from this unit have been documented. Because this unit is inactive and underwent RCRA closure in 1988, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 3 **Used Sand Accumulation Area**

Conclusions: This unit manages nonhazardous used sand in 15-cubic-yard roll-off boxes. No releases from this unit have been documented. Because this unit manages only nonhazardous wastes, is located on concrete, and the contents of this unit are disposed of each weekday by BFI, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 4 **Moldings Baghouse Dust Collector**

Conclusions: This unit manages nonhazardous baghouse dust from the moldings production area in a plastic bag contained in a hopper. No releases from this unit have been documented. Because this unit manages only nonhazardous wastes and is located indoors on a concrete floor, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 5 **Used Sand Storage Piles**

Conclusions: This unit manages nonhazardous used sand in two piles. No releases from this unit have been documented. Because this unit manages only nonhazardous wastes, the piles are partially vegetated, and the facility is making efforts toward removal, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 6 **Slag Accumulation Area**

Conclusions: This unit manages nonhazardous slag in a 15-cubic-yard roll-off box. No releases from this unit have been documented. Because this unit is located indoors on a concrete floor, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 7 **Shot Cleaning Accumulation Areas**

Conclusions: This unit manages nonhazardous sand, slag, and baghouse dust. The sand and slag are managed in 1-cubic yard hoppers and the baghouse dust in plastic bags. The sand, slag, and baghouse dust are moved to a 15-cubic-yard hopper for disposal. No releases from this unit have been documented. Because this unit manages only nonhazardous wastes and the baghouse dust managed by this unit is disposed of in a plastic bag, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 8 **Air Compressor Used Oil Satellite Accumulation Area**

Conclusions: This unit manages a nonhazardous water and used oil mixture in a 55-gallon drum. No releases from this unit have been documented. Because this unit is located indoors on a concrete floor, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 9 **Current Used Oil Storage Area**

Conclusions: This unit manages a nonhazardous water and used oil mixture in 55-gallon drums. No releases from this unit have been documented. Because this unit is indoors on a concrete floor which is about 4 inches below the outside grade, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 10 **Former Used Oil Storage Area**

Conclusions: This unit managed a nonhazardous water and used oil mixture. A release from this unit has occurred, staining soil in the area. IEPA collected a sample of the stained soil. Analysis of this sample detected low levels of several volatile organic compounds and barium. IEPA requested no further action from the facility regarding the stained soil. BFI removed and disposed of about 25 cubic yards of visibly stained and unstained soils in 1992. Because this unit is inactive and soil in the area was disposed of by BFI, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

SWMU 11 **Former Incinerator**

Conclusions: This unit managed nonhazardous trash and rubbish generated by facility activities. Because this unit no longer exists, there is a low potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: PRC recommends no further action for this SWMU at this time.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Electric Arc Furnace Baghouse Dust Accumulation Area	November 1982 to present	None	None
2. Former Hazardous Waste Storage Area	November 1980 to mid-1981; RCRA closed	None	None
3. Used Sand Accumulation Area	Unknown date before 1975 to present	None	None
4. Moldings Baghouse Dust Collector	Early 1970s to present	None	None
5. Used Sand Storage Piles	1991 to present	None	None
6. Slag Accumulation Area	Unknown date before 1975 to present	None	None
7. Shot Cleaning Accumulation Areas	Unknown date before 1975 to present	None	None
8. Air Compressor Used Oil Satellite Accumulation Area	1990 to present	None	None
9. Current Used Oil Storage Area	1992 to present	None	None

TABLE 3 (Continued)

SWMU SUMMARY

	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
10.	Former Used Oil Storage Area	1990 to 1992	Stained soil which was removed and disposed of in 1992	None
11.	Former Incinerator	Unknown period of time before 1980	None	None

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VISUAL SITE INSPECTION SUMMARY

National Castings Incorporated (NCI)
110 North 25th Avenue
Melrose Park, Illinois 60160
ILD 072 317 761

Date:	August 4, 1993
Primary Facility Representative:	Jerry Farmer, Safety Manager, NCI
Representative Telephone No.:	(708) 344-0675
Additional Facility Representatives:	Walter Anderson, Safety Engineer, NCI Edward Stanch, Foundry Manager, NCI
Inspection Team:	Sandy Anagnostopoulos, PRC Environmental Management, Inc. (PRC) Peggy Flaherty, PRC
Photographer:	Peggy Flaherty, PRC
Weather Conditions:	Sunny, approximately 70 °F.
Summary of Activities:	The visual site inspection (VSI) began at 9:20 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 11:00 a.m. PRC observed the following solid waste management units (SWMU): Electric Arc Furnace Baghouse Dust Accumulation Area (SWMU 1), Former Hazardous Waste Storage Area (SWMU 2), Used Sand Accumulation Area (SWMU 3), Moldings Baghouse Dust Collector (SWMU 4), Used Sand Storage Piles (SWMU 5), Slag Accumulation Area (SWMU 6), Shot Cleaning Accumulation Areas (SWMU 7), Air Compressor Used Oil Satellite Accumulation Area (SWMU 8), Current Used Oil Storage Area (SWMU 9), Former Used Oil Storage Area (SWMU 10), and Former Incinerator (SWMU 11). The tour concluded at 2:40 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 2:50 p.m.

APPENDIX A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

(Nine Pages)

Photograph No. 1
Location: SWMU 1
Orientation: Northwest
Date: 08/04/93
Description: This photograph shows the baghouses, dust collector, and roll-off box in the electric arc furnace area.

Photograph No. 2
Location: SWMU 1
Orientation: North
Date: 08/04/93
Description: This photograph shows the dust collector attached to the bottom of the baghouse in the electric arc furnace area.

Photograph No. 3 Location: SWMU 1
Orientation: Northwest Date: 08/04/93
Description: This photograph shows the dust collector and roll-off box in the electric arc furnace area.

Photograph No. 4 Location: SWMU 2
Orientation: Southwest Date: 08/04/93
Description: This photograph shows the Former Hazardous Waste Storage Area. Two piles of railroad ties are stacked in the area.

Photograph No. 5 Location: SWMU 3
Orientation: North Date: 08/04/93
Description: This photograph shows the Used Sand Accumulation Area.

Photograph No. 6 Location: SWMU 4
Orientation: North Date: 08/04/93
Description: This photograph shows the Moldings Baghouse Dust Collector.

Photograph No. 7 Location: SWMU 5
Orientation: West Date: 08/04/93
Description: This photograph shows the smaller of the Used Sand Storage Piles.

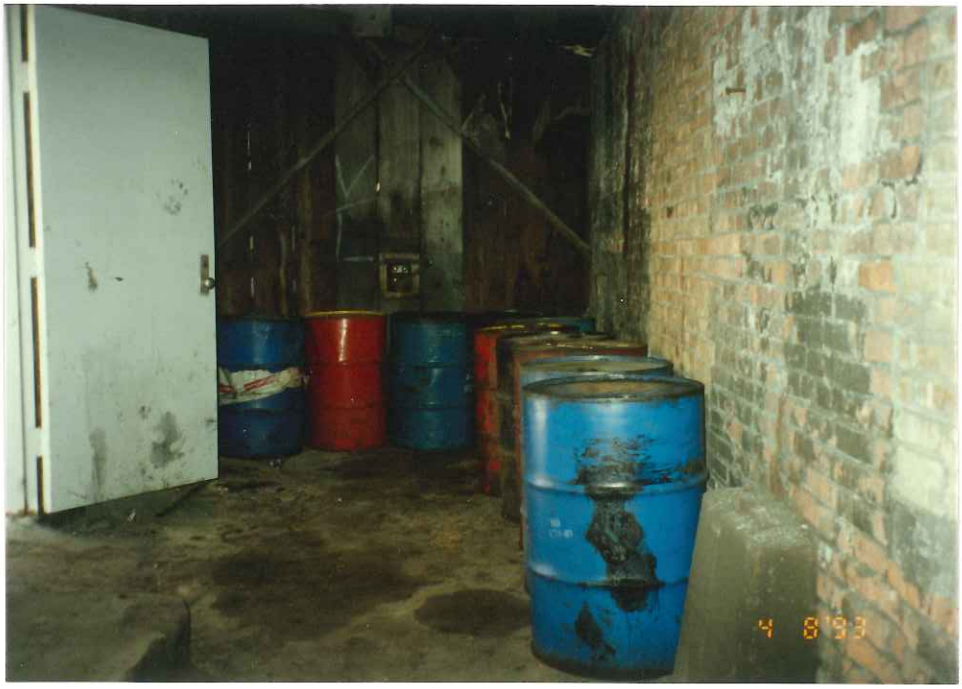
Photograph No. 8 Location: SWMU 5
Orientation: Northwest Date: 08/04/93
Description: This photograph shows the larger of the Used Sand Storage Piles.

Photograph No. 9 Location: SWMU 5
Orientation: North Date: 08/04/93
Description: This photograph shows drums located at the Used Sand Storage Piles.

Photograph No. 10 Location: SWMU 6
Orientation: Northwest Date: 08/04/93
Description: This photograph shows the Slag Accumulation Area.

Photograph No. 11
Location: SWMU 7
Orientation: East
Date: 08/04/93
Description: This photograph shows one of the shot cleaning baghouses, the dust collectors, and the roll-off box in the Shot Cleaning Accumulation Areas.

Photograph No. 12 Location: SWMU 8
Orientation: West Date: 08/04/93
Description: This photograph shows the Air Compressor Used Oil Satellite Accumulation Area.



Photograph No. 13 Location: SWMU 9
Orientation: East Date: 08/04/93
Description: This photograph shows the Current Used Oil Storage Area.

Photograph No. 14 Location: SWMU 10
Orientation: South Date: 08/04/93
Description: This photograph shows the Former Used Oil Storage Area.

Photograph No. 15 Location: SWMU 11
Orientation: East Date: 08/04/93
Description: This photograph shows the location of the Former Incinerator.

APPENDIX B

VISUAL SITE INSPECTION FIELD NOTES

(16 Sheets)

August 4, 1993 Wednesday (119)

National Castings Inc.

Melrose Park

Weather Conditions:

clear, ~ 70°

0920 On-site notification

Sandy A. (PRC)

Peg Flaherty (PRC)

Jerry Farmer (NCI)

Walter Anderson (NCI)

Couplers use a higher alloy content than Cicero plant so baghouse is still D006 with some lead too. Lead not

 8/4/93 NCI

on part A but
goes on manifest.

D006 is just baghouse
which goes to
Perrica (see permit)
~~20 yd^3/month~~ aa
1992 - 270 yd^3 listed
as D006 and D008
PDI treats and
Disposes.

Slag + cores go
to BFI

aa
~~2/8/93~~
8/4/93

8/4/93 NCI

Operating since
maybe ~~1966~~ 1969 aa - 1985
(checking) as
Midland Ross.
from Part A.
Midland Ross
purchased from
unknown. Part
A the facility
dates back to
early 1900s

As of 1985 NCI is
wholly owned
subsidiary of NACO.

122

8/4/93 NCI

Nearest res. w/in ~ 1/4 to 1/2 mile.

In ~~1982~~ DEC 1981 to ~~1983~~ ~DEC 82 plant closed ~~to~~ ~~because~~ of lack of business.

~ 340 employees
3 shifts at 5 days
varies w/ different operations.

Security guard 24 hours and completely fenced

8/4/93 NCI

123

Former bag waste mixing area was ~~[illegible]~~ 55 gal drums w/ plastic and was shipped out.

Had been mixing baghouse dust w/ foundry sand and sending it to landfill prior to 1980.

Currently RR ties are stacked at former stor. area

Have 2 piles of sand spent and reclaim sand. This plant doesn't have a sand reclaimer (like Cicero) so was disposing of more. Will purchase reclaimer in next year. so can reuse more of spent sand.

All scrap metal is reused on site

(Wheeling)
Set Environmental picks up used oil from air compressors ~ 2300 gal/yr. on call in basis. Have to have at least 2100 gall. for Set. to come in.

Used trichloroethane 1,1,1 for core wash never had to dispose of it because some of the solvent would absorb into core when casting was

(126)

made it could evaporate.

Diesel AST for vehicles 200 gal, steel installed 1996.

An UST under parking lot installed in 1975 galvanized steel coated w/ asphalt (1000 gal). Had about 6 mth ago for repair measured amount of gasoline in UST. Found ~ 80 gallons. stopped use ~ early '80's.

(127)

Currently use a water based core wash.

Incinerator ceased use in ~ 1980. don't know a start up date. Was removed in 92.

Water in quench tank never dumped. It is pumped to a holding pit. Tank is cleaned and make-up H_2O

add., MSD checks
sewer discharge
annually.

IEPA out in '92
collected samples
from baghouses
and sandpiles.
Have not heard
about results.

1100. Tours begins
Ed Stalnaker
joins us - foundry
operations manager

use ~ 200 tons sand
per day - reclaim
about 90%

mold is sand, water,
bentonite, cereal flour.

cores sand silicate
are reused and put
back into sand
system if can get
fine enough.

(D) Photo 1 Baghouse 1
Photo 2 Bag from B1
Dry collector
non-hazardous
is the fines of

sand used for molding. Too fine sand in molding leads to poor quality.

This goes to BFI

(2) Photo 3. ramp Baghouse collector hopper ~ 1960-70 early

~ 250 castings/day pour ~ 120 tons per day

~ 70% scrap purchased 30% from on-site reuse.

Photo 4 scrap (1) storage area ~ 100' x 30' been in use since at least '75 and probably since start of operation.

electric arc furnace 20 ton capacity 13,200 V into transformer which is water cooled

along w/ a ring around the roof of the furnace.

furnace lined w/ fire brick. replaced in one a year to year and a half. brick goes to BFI

Purchase low alloy and then add alloys chromium, ~~nickel~~ silicon, manganese molybdenum, alum. as needed

3 Baghouses

B2 collects dust from furnace area.

1 collects from above the furnace and 2 collect from the sidedraft hood of the furnace. This collects dust and heat from the furnace while operating. Baghouse above collects anything other 2 missed

In all 3 Bs about 2000 bags get changed

into lined hopper (20 yd^3).

Bags dumped every 1 or 2 days.

Peoria on call in ~~BFI~~ basis ~ 14 times per year.

Photo 8 2 side draft baghouses (NW)

Baghouse dust went to BFI from '80-'84, and then a couple of other disposal companies Gerry will check

about once every 3 years. Probably change one BFI at a time. Those bags go to Peoria ~~BFI~~. Bagged before hand.

Photo 5 Baghouse (NW)

Photo 6 Peoria dumpster (NW)

Photo 7 Baghouse collect bag (N). Bag opens at bottom is lifted to dumpster and Baghouse dust placed directly

(136)

~~BFI~~ QQ

Photo 9 (~~H~~ QQ) refuse sand ie shakeout sand (too large for use) from cores and molding. (all mixed together again.)

Some of scrap + bentonite comes in by rail so its weighted.

Mixing area currently covered w/ gravel. no

(137)

evidence of ~~[illegible]~~ QQ release

3 piles of railroad ties stacked neatly. Facility reps looking into disposal.

— from rerouting of a railway.

Baghouse dust was only stored in drums in haz waste area from 80-81 when plant closed. Then when reopened

in piles in 91
and piled ~ 1 year.
until sand
reclaimer is in
operation sand
will and is
being disposed of
by BFI

Photo 12 91 steel
55 gal drums
some hold unreusable
sand, grind wheels.
shot blast, some
general debris.
~~Left~~ 3 of drums
will be sifted and
reused as scrap

or shot blast.
been using this
area since Spring
of '93.

Photo 13 Old oil
storage area from
1990 to 1992. After
IEPA sampled moved
indoors. Stored oil
in drums about
60 steel drums
sat on wood pallets.
18' x 25'. Let
oa took oil then
BFI came and
"cleaned up" area.
Removed stained

started current method.

Fac. reps aren't aware of any mixing of slag or wastes in this area.

Pile to reclaim
50 yds x 20 yds
~ 25 ft high.
Photo 10 (NW)
some vegetation.

weather today
clear, ~ 70°F, breezy

No apparent dust problems from this pile or next.

Another pile of spent sand, too coarse to use
~ 100 yds x 50 yds x 35 ft high.
Photo 11 (NW) Can't be reused is being shipped to BFI in last year have sent off ~ 75 loads of 15 to 20 yds^3

Started storing

soil. Gabriella split samples w/ IEPA in 92 for NCI.

Photo 13 3 or 4 hoppers which collect broken cores and unusable sand goes off to BFI currently all on concrete. Since at least 1975 and probably since start of operation. Concrete went in prior during spring 93.

Photo 15 (E). Storage rack for lub. oil, 8 drums. 12' by 12' pig surrounds area. Some evidence of possible spill. Pig would be put in drum and set would take it. Since 1990. No drains in area.

→ waste oil area.

Photo 16 Diesel AST 1991. Have had some spillage due to leaking valve which

Room house air compressor in aluminum sheeting ~ 12' x 20'

Photo 18 Incinerator removed in 91 or 92 don't know when installed. stopped operation prior to '80 currently cvda concrete.

Photo 19 10' x 30' under roof 10 empty steel drums no floor drains concrete floor. In this location since 92. This room is recessed

was replaced spill onto concrete sewer ~ ~~30~~ 100'

Photo 17 used oil from air compressor concrete floor sloped towards an asphalt dike ~ 5" wide & 3" high. Skimming oil off since 1990. Prior to 1990 no leaks in valves so didn't have oil problem. Air compressor used to operate various equipment.

~ 4" from outside ground level.
3 walls brick
1 wall wooden w/ storage area for lawn mower etc. on other side.

4 gas furnaces used to heat treat all castings at ~1700°F (increases strength & impact ductility of casting) Casting is then quenched in one of 2 quench tanks at 80-120°

~ 15' x 20' x 15' Water from quench tanks into pit. Photo 20
Slag removal earlier
Photo 21
Slag pit ~ 10' x 15' x 6' Pour slag into pit (concrete). Slag cools & is removed to hopper goes to BFI as special waste Photo 20

(148)

Photo 22 - Background from shot blast area into plastic bag. Changed ~ every 3 days. dumpster ~ 1/month operating since prior to '75.

Photo 25 - polaroid. liner from trim blast process go to dumpster to BFI since 1976

(149)

Photo 26 polaroid UST

@ 1440 Tour complete Back to office for closing mtg.

84'-90' Peoria and Background Dust

1450 PRC off site

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

Q

listed as Midland-Ross Corp.

FACILITY NAME: NATIONAL CASTINGS INCORPORATED

EPA I.D. NUMBER: I L D 0 7 2 3 1 7 7 6 1

LOCATION CITY: 110 N. 25TH AVENUE

STATE: MELROSE PARK, IL. 60160

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

previously submitted

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator	X	
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

1. INCINERATOR - WEEKLY OPERATION TO INCINERATE ~~WASTE PAPER AND~~ PALLETS.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NONE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

W.E. McINTYRE PLANT MANAGER
Typed Name and Title

W. E. McIntyre
Signature

2/6/86
Date